



NOTA DE ESTUDIO

GRUPO EXPERTO EN MERCANCÍAS PELIGROSAS (DGP)

TRIGÉSIMA REUNIÓN

Montreal, 6 - 10 de octubre de 2025

- Cuestión 2:** Gestión de los riesgos de seguridad operacional específicos del transporte por vía aérea e identificación de anomalías (*REC-A-DGS-2027*)
- 2.2:** Formular propuestas de enmienda de las *Instrucciones Técnicas para el transporte sin riesgos de mercancías peligrosas por vía aérea* (Doc 9284), si se considera necesario, para su incorporación en la edición de 2027-2028

PROCEDIMIENTOS PARA LA CLASIFICACIÓN DE EXPLOSIVOS

(Nota presentada por E Gillett)

SUMMARY

Esta nota pretende aclarar los papeles que desempeñan los productores y las autoridades nacionales competentes en la clasificación de explosivos y ayudar a los expedidores a cumplir las condiciones de embalaje que han sido objeto de una clasificación.

Medidas propuestas al DGP: Se invita al DGP a examinar las enmiendas de la Parte 2, capítulo 1, de las Instrucciones Técnicas que figuran en el apéndice de esta nota de estudio.

1. INTRODUCTION

1.1 Potential ambiguities in the procedures for classifying explosives contained in Part 2;1 of the Technical Instructions in relation to whether classification was to be determined by the shipper or an appropriate national authority were discussed at the Dangerous Goods Panel Working Group Meetings in 2024 (DGP-WG/24, 21 to 25 October 2024, Montreal) and 2025 (DGP-WG/25, 21 to 25 April 2025, Delhi, India) (see paragraphs 4.1.2.3 of the DGP-WG/24 Report and 4.2.2.1 of the DGP-WG/25 Report). The consensus at DGP-WG/24 was that the involvement of an appropriate national authority in the explosives classification process was necessary and was the intent of the UN Model Regulations and Technical Instructions.

1.2 A proposed amendment to the Technical Instructions requiring the involvement of an appropriate national authority was developed based on the discussions at DGP-WG/24 and presented to DGP-WG/25. A recommendation that manufacturers and subsequent distributors of explosive substances

* Solo se han traducido el resumen y el apéndice.

and articles make available the classification to enable subsequent shippers to verify that the original classification remain valid in the event of the explosives being repacked, for example in smaller quantities for subsequent distribution was also proposed. While there was support for these objectives, the working group did not reach consensus on the approach taken in the proposal to achieve this. There were concerns that some States excepted some explosive divisions from classification involving an appropriate competent authority, and perceived implications that if classifications were recommended to be made available, a physical classification document might be expected over an electronic classification record and handling agents might arbitrarily demand the classification. Interested members agreed to work together to develop a proposal for competent authority involvement in classification and on ensuring that packaging used for re-packaged explosives was compliant based on their original classification for DGP/30. This working paper is raised based on the informal discussions held since DGP-WG/25.

1.3 With regards to subsequent shippers verifying that a classification made for explosives received remained valid in the event of the goods being repacked for subsequent distribution, the informal group considered that this was best dealt with by supplementing the note after 2;1.5.1.3:

Note.— The importance of this can be overlooked unless it is realized that a relatively minor change in an inner or outer packaging can be critical and can convert a lesser hazard into a mass explosion hazard.

With “Consequently, if the explosives are repacked for subsequent distribution, the shipper will need to verify that the proposed packaging is permitted by the original classification or re-apply the classification procedure prescribed in this chapter.” It was felt that this achieved the objective without any need to recommend that the classification be made available to subsequent shippers.

1.4 With regards to the classification of explosives, the regulations of many States require a classification by their national authority for explosives travelling to, from or within their territory. Other States allow classifications that have been reached with the involvement of the national authority of another State. It is reasonable for States to determine which model is appropriate based on their capabilities and assessment of the risks involved. For this reason, the proposal in paragraph 2 is for the insertion of ‘1.5.1.4 Prior to transport, the explosive classification must have been conducted, approved or accepted by an appropriate national authority’ (it does not specify that the national authority must be of the same State as the manufacturer or shipper, etc. as such matters can be decided by each State). The revised wording also intends to provide for circumstances such as when the State excludes certain commodities such as small arms ammunition from the classification procedure and allows the shipper to assign a default classification or authorizes a private entity to issue a temporary classification for transport for the purposes of performing the classification procedure elsewhere.

2. ACTION BY THE DGP

2.1 The DGP is invited to consider the amendments to Part 2, Chapter 1 of the Technical Instructions shown in the appendix to this working paper.

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APÉNDICE

PROPUESTA DE ENMIENDA DE LAS INSTRUCCIONES TÉCNICAS

Parte 2

CLASIFICACIÓN DE MERCANCÍAS PELIGROSAS

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Capítulo 1

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1.5 CLASIFICACIÓN DE EXPLOSIVOS

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1.5.1.3 A excepción de las sustancias que figuran por su denominación del artículo expedido en la Lista de mercancías peligrosas (tabla 3-1), los artículos no deben presentarse para el transporte como artículos de Clase 1 hasta que no hayan sido sometidos al procedimiento de clasificación prescrito en este capítulo. Además, el procedimiento de clasificación debe realizarse antes de presentar un producto nuevo para el transporte. En este contexto, un producto nuevo es uno que, a juicio de la autoridad nacional que corresponde, incluye:

- a) una nueva sustancia explosiva o una combinación o mezcla de sustancias explosivas que se considera significativamente diferente de otras combinaciones o mezclas ya clasificadas;
- b) un nuevo modelo de objeto o un objeto que contiene una nueva sustancia explosiva o una nueva combinación o mezcla de sustancias explosivas;
- c) un nuevo modelo de bulto para una sustancia u objeto explosivo, comprendido un nuevo tipo de embalaje interior.

Nota.— Es preciso no restar importancia a este punto y tener en cuenta que un cambio relativamente menor en el embalaje interior o exterior puede ser crítico y convertir un peligro menor en un peligro de explosión masiva. Por tanto, si los explosivos se vuelven a embalar para su distribución ulterior, el expedidor deberá verificar que el embalaje propuesto está permitido en la clasificación original o reiniciar el procedimiento de clasificación prescrito en este capítulo.

1.5.1.4 Antes de proceder al transporte, la autoridad nacional competente debe realizar, aprobar o aceptar la clasificación del explosivo.

1.5.1.45 El productor u otra persona que solicite la clasificación de un producto debe proporcionar información adecuada con respecto a los nombres y características de todas las sustancias explosivas del producto y debe entregar los resultados de todos los ensayos pertinentes que haya realizado. Se supone que todas las sustancias explosivas en un artículo nuevo se han sometido a los ensayos adecuados y han sido aprobadas.

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— FIN —