

UN/SCETDG/20/INF.46

COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

Sub-Committee of Experts on the
Transport of Dangerous Goods
(Twentieth session, 3-12 December 2001,
agenda item 2)

ADDITIONAL PROVISIONS FOR THE TRANSPORT OF GASES

Amended wording in (3)(c) of Packing Instruction P204

Comment on UN/SCETDG/20/INF.12 (AEGPL)

Transmitted by the Expert from Sweden

Introduction

While endorsing “Proposal 5” from AEGPL to introduce a new Packing Instruction P204 for aerosol dispensers into the Model Regulations, the expert from Sweden would nevertheless like to modify the wording in (3)(c) regarding tightness test to avoid any possible misinterpretation.

Background

The proposed wording for P204 is drawn from the new ADR which entered into force 1st of July this year. In the old ADR there is one headline before the paragraphs about tightness testing that has been left out as a consequence of the restructuring. As this headline clearly states that all receptacles shall be tested, it has been suggested that this deletion would give manufacturers the possibility to do away with the actual testing of all receptacles after filling.

Since Sweden considers verifying tightness to be very important this matter was addressed in an information paper (INF.45) at the last WP.15 meeting. There was a clear statement from the Working Party with no opposition that each and every aerosol dispenser (as well as “gas cartridge”) shall be tested. Lacking a firm proposal for a modified wording this was entered in the report only (paragraph 50 of the draft report TRANS/WP.15/2001/CRP.3/Add.4).

The expert from Sweden now proposes a modified wording based on already existing text regarding leakproofness testing of packagings in Chapter 6.1.

6.1.1.3 reads “Every packaging ... shall successfully undergo a suitable leakproofness test”

Proposal

Amend the wording “they shall satisfy a tightness (leakproofness) test” to read
“each of them shall successfully undergo a tightness (leakproofness) test”
