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**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**
(Twenty-second session, 2-6 December 2002
agenda item 4)

NEW AMENDMENT PROPOSALS

Amendment to Special Provision 191

Transmitted by the expert from Austria

Introduction

1. Special Provision 191 is assigned to UN 2037, RECEPTACLES, SMALL, CONTAINING GAS (GAS CARTRIDGES). The special provision contains in its second sentence an exemption, which reads as follows: "Receptacles with a capacity not exceeding 50 ml containing only non-toxic constituents are not subject to these Regulations".
2. From the point of view of hazard the scope of the exemption seems wide on the one hand and rather restrictive on the other hand. It seems too wide with regard to flammable gases, the inherent hazard of which may, depending on the circumstances, be as high as that of toxic gases. On the other hand for cartridges containing only non-toxic and non-flammable gases, e.g. CO₂ or N₂O, the limit of 50 ml seems rather arbitrary, given the fact that the capacities of most cartridges which are actually on the market range between 10 ml and 120 ml. For cartridges with non-toxic and non-flammable contents it may not be assumed that the hazard of the 120 ml type is considerably higher than that of a 50 ml type.
3. It is therefore proposed to modify the wording of the second sentence of SP 191.

Proposal

4. Amend the second sentence of Special Provision 191 to read as follows:
"Receptacles with a capacity not exceeding 120 ml containing only non-flammable, non-toxic constituents are not subject to these Regulations".
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