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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(b))

NEW PROPOSALS

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

Comment on ST/SG/AC.10/C.3/2002/8 (AEGPL)

Transmitted by the expert from Sweden

**Introduction**

While endorsing the proposal from AEGPL to introduce a new Packing Instruction P204 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 derived from the restructured annexes of the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR) that entered into force on 1 July 2001. 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 stated that all receptacles had to 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 at a meeting of the United Nations Economic Commission for Europe's Working Party on the Transport of Dangerous Goods in November 2001. There was a clear statement from the Working Party with no opposition that each and every aerosol dispenser (UN 1950) as well as "gas cartridge" (UN 2037) shall be tested (see TRANS/WP.15/167, paragraph 38).

The expert from Sweden 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"

## **Comment**

This proposed wording is fully in line with the present text of 6.2.4.1 (1<sup>st</sup> sentence), which moreover applies to aerosols also.

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