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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-first session, 1-10 July 2002, agenda item 2)

ADDITIONAL PROVISIONS FOR THE TRANSPORT OF GASES

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 new ADR that entered into force 1st of July last 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 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 the WP.15 meeting last November. 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 (1st sentence), which moreover applies to aerosols also.
