

**ECONOMIC COMMISSION FOR EUROPE**

**INLAND TRANSPORT COMMITTEE**

Working Party on the Transport of Dangerous Goods

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Gas Cylinders used in the equipment of Ships and Aircraft

Transmitted by the Government of the United Kingdom

**SUMMARY**

Summary: This document proposes an amendment to ADR to permit the transport by road of cylinders that form part of the equipment of a ship, aircraft or spacecraft that are in compliance with the IMDG Code and the ICAO Technical Instructions.

Measures to be taken: Amend the text of ADR

**Introduction**

The United Kingdom would like to propose the following amendment to ADR that would allow the carriage and filling of gas cylinders forming part of the equipment of a ship, aircraft or spacecraft, which do not comply with ADR but are in compliance with the IMDG Code or ICAO Technical Instructions.

These cylinders are in use in the UK as part of their equipment on merchant ships, naval ships and helicopters. They may, for example, be used to inflate a helicopter's float or a decoy on a naval ship using non flammable, non toxic gases.

Typically, these gas cylinders are approved by the DoT and can be transported by road under Multilateral Agreement M180 from a location of temporary storage to the end-users but this does not cover the servicing needs.

The intent of the proposal is to allow cylinders that hold gases having a classification code of 1A, 1O, 2A and [2O] to be transported by road and refilled in the country in which they arrive by ship or aircraft.

**Proposal:**

1) Add the following special provision to Chapter 3.3, which would be applicable to all gases with a classification code of 1A, 2A, 1O or [2O], and would read as follows:

“6XX Cylinders [approved by the DoT and] conforming with the requirements of the IMDG Code or the ICAO Technical Instructions and solely for use within the equipment of a ship, aircraft or spacecraft but not conforming to the provisions of 6.2.3.6 (approval of receptacles), 6.2.3.4 (initial inspection), 6.2.3.5 (periodic inspection) and 6.2.3.7 (marking of receptacles) may be carried and filled with this gas provided the following conditions are met:

- (a) The gas cylinders shall be carried with valve protection in conformity with 4.1.6.8;
- (b) The cylinders shall be marked and labelled in conformity with 5.2.1 and 5.2.2;
- (c) All relevant requirements with regard to filling limits and testing periodicities of P200 shall be fulfilled;
- (d) The following additional entry shall be made in the transport document:  
“Carriage in accordance with Special Provision 6XX”.

2) Add SP 6XX against all the gases entries in Table A of Chapter 3.2 with the classification codes 1A, 2A, 1O, and [2O].

**Justification**

The cylinders are safe for transport by the sea or air mode and will be filled in accordance with P200 which also appears in the sea and air regulations and is applicable to these cylinders.

Cylinders installed within equipment often have no valve guards due to lack of space when mounted in the equipment and valve caps are frequently lost. The requirement in (a) addresses this and allows all the solutions listed in 4.1.6.8.

The requirement to indicate on the transport document that these cylinders are carried under this special provision is intended not only as an aid to enforcement but it will also aid segregation of these cylinders from those in general use within contracting parties.

Safety will be enhanced by permitting the transport of the cylinders to filling centres which are properly equipped and have the necessary expertise.

**Safety**

These cylinders are safe for transport and filling will be safe when they are correctly identified and filled with due reference to their stamped test pressure.

**Feasibility**

Nothing in the proposal is difficult to implement and reference to the special provision in the transport document gives transparency to the operations.

**Enforceability**

No problems are foreseen.

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