



**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****Forty-sixth session**

Geneva, 1 – 9 December 2014

Item 2 (a) of the provisional agenda

**Recommendations made by the Sub-Committee on its forty-third,
forty-fourth and forty-fifth sessions and pending issues: explosives and related matters****Proposal to add clarifying language to SP280****Transmitted by the Council on Safe Transportation of Hazardous
Articles (COSTHA)¹****Introduction**

1. At the forty-fifth session, COSTHA noted practical issues with testing laboratories' interpretations of what is meant by "as presented for carriage" in special provision SP280. Specifically, COSTHA noted:

"Test Labs are interpreting the language "as presented for carriage" to mean that a test result is considered valid only for exactly that combination of product and package which was presented for the test. As a result; package details such as size, UN certification string, and density of products inside the package are recorded. In consequence any change of these parameters is subject to re-examination by the test lab not excluding a repeat test."

2. An example of this problem would be a testing laboratory indicating that a package needed to be retested if less than the number of devices which were originally tested were packed in the approved packaging (tested six (6) devices but only packed five (5) in the package).

3. In ST/SG/AC.10/C.3/2014/55, COSTHA requested the language be discussed by the Working Group on explosives which could then be presented to the Sub-Committee for

¹ In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

review and adoption. The proposed language presented by the Working Group on Explosives was not adopted by the Sub-Committee.

4. However, COSTHA received a number of suggestions on ways to proceed including language which would not impact consignments of materials other than UN3268. Given the significant impact of having to retest packagings based on this overly conservative interpretation, COSTHA believes an additional clarification sentence would be beneficial.

Proposal

5. COSTHA proposes to add the following sentence to Special Provision of SP280:

Packaging of the same design shall be deemed to be covered by the test result provided the density inside the package remains unchanged, or the number of articles inside the package as offered for transport does not exceed the number tested.

6. The full Special Provision 280 would read:

This entry applies to safety devices for vehicles, vessels or aircraft, e.g. air bag inflators, air bag modules, seat-belt pretensioners, and pyromechanical devices, which contain dangerous goods of Class 1 or of other classes, when transported as component parts and if these articles as presented for transport have been tested in accordance with Test Series 6(c) of Part 1 of the Manual of Tests and Criteria, with no explosion of the device, no fragmentation of device casing or pressure receptacle, and no projection hazard nor thermal effect which would significantly hinder fire-fighting or emergency response efforts in the immediate vicinity. Packaging of the same design shall be deemed to be covered by the test result provided the density inside the package remains unchanged, or the number of articles packed inside the package when offered for transport does not exceed the number tested. This entry does not apply to life saving appliances described in special provision 296 (UN Nos. 2990 and 3072).
