

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

25 June 2016

Sub-Committee of Experts on the Transport of Dangerous Goods

Forty-ninth session

Geneva, 27 June – 6 July 2016

Item 6 (e) of the provisional agenda

Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: portable tanks

Proposal to modify to P902

Transmitted by the Council on Safe Transportation of Hazardous Articles (COSTHA)

Introduction

1. Packing Instruction P902 is applicable to UN3268 SAFETY DEVICES *electrically initiated*. Devices included under this entry include air bag inflators, air bag modules, and seatbelt pretensioners which have been classified as a Class 9 material based on testing required by SP280.
2. P902 provides authorization to transport unpackaged articles (devices) in non-specification “dedicated handling devices, vehicles or containers when moved from where they are manufactured to an assembly plant.” This allows for the movement of devices which are to be installed into vehicles at the production factory without significant additional packaging. This provision is also found in P902 in the IMDG Code and the ADR. Packing Instruction PI961 in the ICAO Technical Instructions also includes a similar provision; however, ICAO adds additional requirements that the shipment can only be offered on cargo aircraft, the devices must be secured within the handling device, and the gross mass of the handling device cannot exceed 1000 kg.
3. It is not always practical to transport the dedicated handling device directly from the manufacturer of the safety device to the vehicle assembly plant. The handling devices may need to be staged at warehouses for import or export customs reasons, or may need to be introduced into a distribution system that will receive the handling device, prepare new paperwork for the shipment, and reoffer it for transport to the assembly plant.
4. COSTHA believes the language in P902 was intended to include the movement of these handling devices from the manufacturer to the assembly plant, including intermediate stops through the distribution chain. However, as written, the provision is interpreted to mean only a direct movement from the device manufacturer to the vehicle assembly plant with no intermediate stops.
5. During the 48th Session, the Subcommittee provided a number of comments on the proposal including interest in reviewing competent authority approvals which include such movements. In the Annex to this document, COSTHA is providing an example of such an approval issued by the United States (DOT SP-13396). We note that this document was

incorporated into the US Hazardous Materials Regulations in 2012 and 2014 and therefore does not fully reflect current proper shipping names or packing group references.

6. As stated previously, COSTHA is not aware of any incidents involving dedicated handling devices packed with Safety Devices in any modes of transport. We are not aware of any incidents involving such handling devices covered by said approvals which authorize the transport of handling devices to and from intermediate handling locations such as distribution centres. Thus, we do not believe this modification would adversely impact safety. However, it would eliminate the need for approval requests.

7. Therefore, COSTHA proposes the language in P902 applicable to unpackaged articles be modified to permit the movement of unpackaged Safety Devices in dedicated handling devices, vehicles or containers when moved to or from the device manufacturer or an assembly plant including intermediate handling locations.

Proposal

8. COSTHA proposes to modify the sentence under the heading **Unpackaged articles** in P902:

The articles may also be transported unpackaged in dedicated handling devices, vehicles or containers when moved to, from, or between where they are manufactured ~~to~~ and an assembly plant including intermediate handling locations.
