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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 23 November 2017** | |
| **Sub-Committee of Experts on the Transport of Dangerous Goods** |  |
| **Fifty-second session** |  |
| Geneva, 27 November-6 December 2017  Item 6 (c) of the provisional agenda  **Miscellaneous proposals for amendments to the**  **Model Regulations on the Transport of Dangerous Goods**  **portable tanks** |  |

Tanks – Inspection of pressure-relief device

Transmitted by the European Industrial Gases Association (EIGA)

Introduction

1. The Expert from Germany has transmitted ST/SG/AC.10/C.3/2017/30 proposing that the provisions of 4.2.1.17 should apply to “substances with a Class 8 subsidiary hazard.”

2. Whilst fully recognising and appreciating the intent to assess any defects in pressure relief devices at the earliest opportunity, the experience of EIGA members, who transport a number of the substances with a Class 8 subsidiary hazard, is that the existing inspection regime is satisfactory.

3. At the time of fill, pressure relief devices are subject to an inspection. This inspection will include a leakproof test.

4. Within ST/SG/AC.10/C.3/2017/30 there is no evidence to support the reduction in the inspection interval. As a minimum to accompany any proposal to reduce (or increase) an inspection interval, evidence would be expected, for example results of lift tests of in -service pressure relief devices.

5. EIGA would be happy to work with the Expert from Germany on EIGA members’ experience of pressure relief devices.