



**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****Fifty-fourth session**

Geneva, 26 November-4 December 2018

Item 2 (c) of the provisional agenda

**Recommendations made by the Sub-Committee on its fifty-first,
fifty-second and fifty-third sessions and pending issues:
listing, classification and packing****Classification of self-inflating recovery devices****Transmitted by the expert from Germany*****Introduction**

1. At the fifty-second and at the fifty-third session of the Sub-Committee, the expert from Germany presented proposals for the possible classification of self-inflating recovery devices, see documents ST/SG/AC.10/C.3/2017/29 and ST/SG/AC.10/C.3/2018/13.
2. Views were divided on the proposed options in document ST/SG/AC.10/C.3/2018/13. Most experts were not in favour of extending the scope of application of UN No. 2990 (option 1) as they considered that this entry had been specifically created to cover appliances performing a live-saving function and should not be used for other purposes.
3. After some discussion and noting that some of these devices met the criteria for exclusion from Class 1, the expert from the United States of America suggested considering addressing them in a note under 2.1.3.6.4. Although acknowledging that this solution might not be suitable for all the potential configurations of these devices, the proposal was well received, and most experts welcomed this suggestion. The Sub-Committee noted the increasing need to address classification of these types of devices as new products are being developed (e.g. self-inflating jackets, self-inflating helmets).

Conclusions

4. In principle, self-inflating devices function in the same way as live-saving appliances (UN 2990) or safety devices (UN 0503 and UN 3268). They contain a gas receptacle with a

* In accordance with the programme of work of the Sub-Committee for 2017–2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, paragraph 98 and ST/SG/AC.10/44, para. 14).

non-flammable gas that is opened by means of an activation device, either electrically or pyrotechnically.

5. Although a complete exemption was also one of the options presented in document ST/SG/AC.10/C.3/2018/13, it seems not justified as similar articles as live-saving appliances and safety devices require shipment as dangerous goods.

6. A possible way forward could be to allow the assignment of articles with explosives to the new UN numbers 3537 to 3548 when the article meets the criteria 2.1.3.6.4. Thus, the streamer recovery device, as described in INF.6 (fifty-third session), could be classified as UN 3538 ARTICLE, CONTAINING NON-FLAMMABLE, NON TOXC GAS, N.O.S. (proposal 1). Furthermore, for articles with explosive substances that cannot be excluded from class 1 a new class 1 entry should be inserted. Based on the experience with safety devices, a 1.4G entry is proposed unless further test data is presented on these products, (proposal 2).

Proposal 1

7. Amend 2.0.5.4 to read as follows (new text is underlined):

This section does not apply to dangerous goods of Class1_Division 6.2, Class 7 or radioactive materials in articles. However, this section applies to articles containing explosives which are excluded from class 1 in accordance with 2.1.3.6.4.

Proposal 2

8. In the dangerous goods list, insert the following new entry:

UN No.	Name and description	Class or division	Subsidiary risk	UN PG	SP	LQ	EQ	Packagings and IBCs		Portable tanks and bulk containers	
								PI	Special packing provisions	Instruction	Special provisions
35xx	SELF-INFLATING DEVICES	1.4G			yyy	0	0	P135			

In chapter 3.3, insert the following new special provision:

“yyy This entry applies to articles which contain Class 1 explosive substances and which may also contain dangerous goods of other classes, other than UN 0503, UN 2990 or UN 3268. Articles excluded from class 1 in accordance with 2.1.3.6.4 shall be classified in accordance with 2.0.5.