

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

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**Sub-Committee of Experts on the
Transport of Dangerous Goods**

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Item 3 of the provisional agenda

Listing, classification and packing

Scope of the penultimate sentence in P903 5)

Transmitted by the expert from Switzerland

Summary

Executive summary: Clarify the scope of the penultimate sentence in P903 5).

Action to be taken: Amend the text of the penultimate sentence in P903 5).

Introduction

1. During the translation works in other languages we have observed that the wording in the penultimate sentence of P 903 5) could be misinterpreted:

«Devices such as radio frequency identification (RFID) tags, watches and temperature loggers, which are not capable of generating a dangerous evolution of heat, may be transported when intentionally active in strong outer packagings.

When active, these devices shall meet defined standards for electromagnetic radiation to ensure that the operation of the devices does not interfere with aircraft systems ».

2. Is the aim to prohibit the transport of inactive devices? The question is whether to be active this is a requirement or whether it is a description of a condition (active in robust packaging) that is intended to be allowed. If the condition for authorizing their transport was that they were active, then their transport inactive would not be allowed.

3. If it is only the description of their condition, the position of the terms of the sentence should be reversed in order that this meaning would be clear.

Proposal

4. Modify the penultimate sentence in P903 5) as follows (added text underlined in bold, deleted text in strikethrough):

«When intentionally active, ~~d~~Devices such as radio frequency identification (RFID) tags, watches and temperature loggers, which are not capable of generating a dangerous evolution of heat, may be transported ~~when intentionally active~~ in strong outer packagings».