

**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

New entry for aerosol generating, fire suppression devices

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

Introduction

1. A proposal from the expert from France at the fifty-sixth session of the Sub-Committee offered two options for addressing the transport of fire suppression devices. The first option was to recognize fire suppression dispersing devices as "Safety Devices, UN 3268 and the second was to create a specific entry with appropriate requirements in a special provision similar to SP 280 but tailored to the unique characteristics of these articles. COSTHA agrees with France that the new entry should be more-broad to cover fire suppression devices that not only generate an aerosolized dispersion of fire suppression material. This would include fire suppression dispersing devices that are designed to disperse a fire extinguishing medium which may be a solid or liquid fire suppressing material. COSTHA favors the second option offered by France because these articles are shipped in significant quantities and have unique characteristics and there are several innovative fire suppression safety devices that disperse fine particles or liquids using an explosive initiator that are commonly transported worldwide.

Proposal

2. The new entry name could be amended to be more neutral for example "Fire Suppression Dispersing Device, UN 35XX, Class 9" as it was proposed in the initial informal document INF.48 (55th session).

It is proposed that a new entry be added in the Dangerous Goods List as follows:

UN No.	Name and description	Class or division	Subsidiary hazard	UN packing group	Special provisions	Limited and excepted quantities		Packagings and IBCs		Portable tanks and bulk containers	
								Packing instruction	Special packing provisions	Instructions	Special provisions
35XX	<u>Fire Suppression Dispersing Devices</u>	9			XYZ	0	EO	P003			

3. A new special provision XYZ is proposed as follows:

“XYZ Fire Suppression Dispersing devices are intended to provide a safety benefit based on their ability to extinguish flames by dispersing a fire extinguishing agent. The devices may be either electrically activated or thermally activated and shall be designed to prevent inadvertent activation either by shipping the actuation component separately (e.g. thermally activated head, and the main_unit are shipped separately) or by ensuring that the electrically initiated devices are not electrically connected and there is a secondary means of protection to prevent activation. Devices may contain dangerous goods of Division 1.4, if they 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.

This entry does not apply to “SAFETY DEVICES, electrically initiated” described in special provision 280 (UN No. 3268).”

4. The entry name in the index could be amended as following:

Name and description	Class	UN Number
Fire Suppression Dispersing devices	9	35XX

5. Modify the special provision 280 as following:

“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. This entry does not apply to life saving appliances described in special provision 296 (UN Nos. 2990 and 3072) and Fire Suppression Dispersing devices (UN No. 35XX).”