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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

26 November 2020

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

#### Fifty-seventh session

Geneva, 30 November-8 December 2020

Item 5 (b) of the provisional agenda

**Transport of gases: miscellaneous**

## ISO response to written comments on ST/SG/AC.10/C.3/2020/13 and INF.31/Rev.1

### Transmitted by the International Organisation for Standardisation (ISO)

#### Introduction

1. ISO thanks all the delegations who have expressed support for the proposals in document ST/SG/AC.10/C.3/2020/13 and informal document INF.31/Rev.1. We are grateful to those delegations who have studied the proposals in detail and raising questions and finding errors. This paper presents ISO's answers to the comments and suggestions made.

#### Comment from Belgium

2. **Comment:** "We wonder why in WD 13 proposal 7, paragraph 17 and in proposal 11, paragraph 27 an application date ending in 2024 is proposed while for the other proposals it is 2026."

3. **Answer:** The proposals in paragraphs 17 and 27 cover references to standards for periodic inspection. As laid out in Part 6 of the *Guiding Principles for the development of the UN Model Regulations*, standards dealing with construction usually have a 6 year transition period, but standards for periodic inspection are allocated 4 years.

#### Comment from China

4. **Comment:** "There is also a reference to ISO 11118:2015 in PP89 of P206 in Proposal 8. Should it be updated correspondingly?"

5. **Answer:** Packing Instruction P206 was proposed for adoption into the Model Regulations by CEFIC. ISO does not have expertise in Chemicals under Pressure and therefore has not made a proposal to update the reference to ISO 11118:1999 in PP89. We would welcome an approach from the chemicals industry to update the reference to ISO 11118 in PP89. It would probably be beneficial to reference the specific clauses of the standard covering the limitation of cylinder size.

## Comments from The Netherlands

6. **Comment:** “proposal 3: the title in the table should be “Part 3: Normalized ...” instead of “Part 1. Quenched ...”.”

7. **Answer:** The Netherlands is correct. In paragraph 6 the table should appear as:

ISO 9809-3:2019	Gas cylinders – Design, construction and testing of refillable seamless steel gas cylinders and tubes – Part 3: Normalized steel cylinders and tubes	Until further notice
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8. **Comment:** “proposal 5: we think this requires additional amendments in table 6.2.2.4, along the lines of proposal 7 of the document.”

9. **Answer:** The Netherlands is correct. A new proposal concerning ISO 16111 should be added to Proposal 5 in paper 2020/13 after paragraph 12 as follows.

### Proposal 5 continued

“12a In the table in 6.2.2.4 in the row starting ISO 16111:2008 replace “Until further notice” with “Until 31 December 2024”. Add the following new row to the table after the row starting ISO 16111:2008:

ISO 16111:2018	Transportable gas storage devices – Hydrogen absorbed in reversible metal hydride	Until further notice”
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10. **Comment:** “proposal 8: the proposal refers to table 6.2.2.1.9, we assume that this should be 6.2.2.1.1.”

11. **Answer:** Proposal 8 is correct as presented in paper 2020/13. As a part of the revision of Chapter 6.2 to distinguish between pressure receptacle shells and their closures a new paragraph 6.2.2.1.9 was introduced to cover non-refillable cylinders. This may be confirmed by reference to pages 9 and 10 of the Secretariat’s paper 2020/59 Consolidated list of draft amendments.

12. **Comment:** “proposal 11: we would prefer the following reference in the table (in line with the reference in paragraph 1 of the document): “10462:2013 + A1:2019” instead of “ISO 10462:2013 + Amd1:2019”.

13. **Answer:** This comment led ISO to look at other references and we found the form “+A1” is used in 6.2.2.2, 6.2.2.3 and 6.2.2.4 and “+Amd1” (and ‘+Cor.1’) is used in 6.2.2.1.1 and 6.2.2.1.2. There is a need to be consistent and ISO believes the Model Regulations should use the form “+Amd.1” (and “Cor.1”) that is used in the ISO catalogue since the ISO catalogue is where readers will search for the standard. Therefore, we decline to support this suggestion from The Netherlands since this proposal as presented will be a step in the preferred direction.