

COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

Sub-Committee of Experts on the

Transport of Dangerous Goods

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MISCELLANEOUS DRAFT AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Listing, classification and packaging

Air bag inflators, air bag modules and seat-belt pretensioners

Comments on proposal ST/SG/AC.10/C.3/2000/12

Transmitted by the Expert from France

1. INTRODUCTION

The experts from Germany, Norway, Sweden and the United Kingdom submitted a proposal on air bags inflators, air bag modules and seat-belt pretensioners. The intent was to simplify the approach to classify these articles which may contain various dangerous goods.

In ST/SG/AC.10/C.3/2000/12, special provisions 235 and 280 were amended. The expert from France is of the opinion that :

- proposed special provisions 235 and 280 contain some inconsistencies. This information paper proposes to align special provision 235 and the first part of special provision 280 concerning the description of the articles. The cut-off point of 2 grams has been taken into account.
- As far as articles containing 2 grams or more of explosive substances are concerned, the only way to exclude them from class 1 is to test them in accordance with the Manuel of Tests and Criteria. Therefore the expert from France thinks that the second and third sentences of the proposed special provision 280 have to be deleted to prevent any misunderstanding.

2. PROPOSAL

Amend special provision 235 as follows :

This entry applies to articles ~~containing~~ **which contains** 2 grams, or more, of **class 1** explosive substances **and which may also contains dangerous goods of other classes such as compressed gases or flammable liquids. These articles are used as life saving vehicle air bag inflators or air bag modules or seat-belt pretensioners .**

Amend special provision 280 as follows:

This entry applies to articles ~~containing dangerous goods with none or with less than~~ **which contain less than 2 grams of pyrotechnic material class 1 explosive substances and which may also contain dangerous goods of other classes such as compressed gases or flammable liquids. These articles** are used as life saving vehicle air bag inflators or air bag modules or seat-belt pretensioners.

~~For units with 2 grams pyrotechnic material or more, initiated explosive effects shall be contained within the article or the pressure vessel such that the article may be excluded from Class 1 in accordance with 2.1.1.1 (b), in conjunction with 16.6.1.4.7(a)(ii) of the *Manual of Tests and Criteria, Part I. In addition, articles shall be designed or packaged for transport so that when engulfed in a fire there will be no fragmentation of any pressure vessel or projection hazard. This shall be determined by analysis.*~~

This entry may also apply to articles **containing 2 grams, or more, of explosive substances** classified in ~~division 1.4 S~~ **class 1** in accordance with 2.1.1.1, 2.1.1.2 2.1.1.3 and 2.1.1.4, ~~which are used as life saving vehicle air bag inflators or air bag modules or seat belt pretensioners,~~ when transported as component parts and when these articles as presented for transport have been tested in accordance with test series 6 (c) of part I of the *Manual of Tests and Criteria*, with no explosion of the device, no fragmentation of device casings **or any pressure vessel**, and no projection hazard or thermal effect which would significantly hinder fire-fighting or other emergency response efforts in the immediate vicinity.
