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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

Sub-Committee of Experts on the Transport of Dangerous Goods

(Twenty-second session, 2-6 December 2002,
agenda item 4 (b)(ii))

NEW PROPOSALS

New issues

Comments on ST/SG/AC.10/C.3/2002/83

Transmitted by the Expert from the United Kingdom

1. The expert from the United Kingdom welcomes the attempt by the expert from Canada to develop comprehensive regulations for metal hydride systems.
2. The expert from the United Kingdom however is aware that devising regulations for these devices raises complex questions particularly in the area of classification. For example if the system is classified as a pressure vessel under division 2.1 is it necessary to have a subsidiary risk. The scenario associated with the risk presented by the solid absorption material (hazard of 4.1, 4.2 or 4.3) is the catastrophic failure of the containment – but this will only follow a hydrogen release, the hazard of which is covered by the Class 2 classification. Only the uncharged vessel (arguably) presents a hazard other than Division 2.1.
3. The expert from the United Kingdom suggests that as these systems raise a number of issues, no firm decision is made but instead the subject is considered afresh during the next biennium.
