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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-sixth session, 29 November-3 December 2004  
Item 3(a) of the provisional agenda

**OUTSTANDING ISSUES OR PROPOSALS OF AMENDMENTS TO THE RECOMMENDATIONS  
ON THE TRANSPORT OF DANGEROUS GOODS**

Transport of gases

Proposal on low pressure Division 2.2 Gases

Transmitted by the European Industrial Gases Association (EIGA)

**Introduction**

EIGA presented an informal paper at the twenty-fifth session to introduce a debate on the subject of the classification since it was concerned that classification of Division 2.2 is not applied uniformly in all the international agreements. As a result of that discussion, it was clear that a consensus for harmonisation was not yet available. However, as a small step forward, EIGA presents this formal proposal to make the classification more logical. This proposal does not change the scope of application or effect of the Model Regulations.

**Proposal**

Amend Paragraph 2.2.2.1 (b) as follows (new words shown underlined).

(b) Division 2.2 *Non-flammable, non-toxic gases*

Gases which ~~are transported at a pressure not less than 280 kPa at 20 °C, or as a refrigerated liquids, and which:~~

- (i) are asphyxiant – gases which dilute or replace the oxygen normally in the atmosphere; or
- (ii) are oxidising – gases which may, generally by providing oxygen, cause or contribute to the combustion or other material more than air does; or
- (iii) do not come under the other divisions;

**NOTE:** Compressed, liquefied and dissolved gases which are transported at a pressure less than 280 kPa at 20 °C are not subject to these Regulations.

### **Justification**

The process of assigning gases to one of three divisions is stated in 2.2.2.1 to be “based on the primary hazard of the gas during transport”. It is not a process of assessing the risk in transport. In the present text, the process of assigning a hazard division is mixed together with risk assessment. It is true that Division 2.2 gases at low pressure present a lower risk in transport than the same gases transported at higher pressure, but their hazards are not absent at low pressure.

As it stands the definition of Division 2.2 precludes any allocation of hazard to gases which happen to be at low pressure. If, for example, nitrogen is packed at 200 kPa, it is impossible to classify it as UN 1066. This is equivalent to stating that nitrogen is not an asphyxiant when at low pressure.

The new formulation proposed above is more logical. Classification is completed in all cases and then it is made clear that low pressure Division 2.2 gases which are not refrigerated liquid are exempted from the Regulations. This is clearer and more transparent foundation for the regulation of Division 2.2.

### ***Safety implications***

None.

### ***Feasibility***

No problem.

### ***Enforceability***

Made easier by clarifying the status of low pressure gases.

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