



Secretariat

Distr.  
GENERAL

ST/SG/AC.10/C.3/2004/92  
3 September 2004

ORIGINAL: ENGLISH

**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 (c) of the provisional agenda

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

Miscellaneous proposals

Proposal to amend the description, the proper shipping names, and the special provisions for UN 0503  
(Division 1.4 G) and for UN 3268 (Class 9) by an entry on "Safety devices for vehicles"

Transmitted by the expert from Germany

**SUMMARY**

Executive summary: Amendment of UN 0503 and UN 3268  
"AIR BAG INFLATORS or AIR BAG MODULES or  
SEAT-BELT PRETENSIONERS or SAFETY DEVICES"

Action to be taken: UN Model Regulations on the transport of dangerous goods, *thirteenth revised edition, Chapter 3.2, Dangerous goods list  
UN 0503 and UN 3268  
in accordance with Appendix B Glossary of terms  
AIR BAG INFLATORS or AIR BAG MODULES  
or SEAT-BELT PRETENSIONERS*  
and in accordance with Chapter 3.3 *Special provisions applicable to certain articles or substances  
Nos 235, 280 and 289*

Related documents: –

**Introduction:**

The development of life-saving appliances in the automotive industry has made considerable progress since the introduction of UN 3268. The present range of appliances goes well beyond those listed in UN 3268 and UN 0503. For example, they include a number of elements that are actuated by the electric signal of the crash sensor.

Examples include:

- pyromechanical safety elements which serve to interrupt electric connections. In case of emergency, the main power cable in the vehicle is disconnected from the battery to prevent short circuit and to minimize the risk of fire in the vehicle;
- pyromechanical actuators which are used for active headrests or for pedestrian protection to release special hinges of the engine hood.

Those safety device designs cannot be assigned to UN 3268 although they are complying with all Class 9 safety requirements for transport.

The following proposal initially aims at amending the entry for UN 3268. This will automatically result in corresponding amendments in the entry for UN 0503.

**Proposal:**

**Appendix B GLOSSARY OF TERMS** should be amended to read as follows:

"AIR BAG INFLATORS or AIR BAG MODULES or SEAT-BELT PRETENSIONERS or SAFETY DEVICES

Articles which contain pyrotechnic substances and are used as life-saving vehicle airbags or seat belts or safety devices. Vehicle safety devices are components for separation, locking, or release-and-drive systems."

**Chapter 3.2 Proper shipping names** of UN 0503 and UN 3268 should be amended to read as follows:

"AIR BAG INFLATORS or AIR BAG MODULES or SEAT-BELT PRETENSIONERS or SAFETY DEVICES"

**Special Provision 235, UN 0503**, should be amended to read as follows:

"This entry applies to articles which contain Class 1 explosive substances and which may also contain dangerous goods of other classes. These articles are used as life-saving vehicle air bag inflators or air bag modules or seat-belt pretensioners or safety devices."

**Special Provision 280, UN 3268**, should be amended to read as follows:

"This entry applies to articles which are used as life-saving vehicle air bag inflators, air bag modules or seat-belt pretensioners or safety devices and which contain dangerous goods of Class 1 or dangerous goods of other classes and 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 I of the *Manual of Tests and Criteria*, with no explosion of the device, no fragmentation of device casing or pressure vessel, and no projection hazard nor thermal effect which would significantly hinder fire-fighting or emergency response efforts in the immediate vicinity."

**Special Provision 289, UN 0503 and UN 3268**, should be amended to read as follows:

"Air bags or seat belts or safety devices installed in vehicles or in completed components such as steering columns, door panels, seats etc. are not subject to these Regulations."

(All proposed amendments are underlined.)

**Justification:**

Under Special Provision 280, the above safety devices shall be tested according to the UN 6(c) Test Series and may not be classified under UN 3268 unless they have passed the test satisfactorily. When this is the case, there will be no safety risk. The most solid proof for the validity of this view comes from the positive experience gained in the world-wide transport of articles already classified under UN 3268.

The above proposal is urgently needed for the international automotive industry so as to enable the industry to secure the global logistic network for supply and production and, in particular, for the supply of individual service outlets. This has become less and less possible in case of the classification under one of the UN numbers of Class 1.

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