



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

Forty-fourth session

Geneva, 25 November–4 December 2013

Item 2 (c) of the provisional agenda

Listing, classification and packing: Miscellaneous

Clarification of the definition of aerosol, UN No. 1950

Submitted by the expert from France¹

Introduction

1. French experts regularly receive queries about an aerosol's nature as an article. There appears to be confusion in particular between article and inner packaging of combination packaging.
2. The current definition contained in Chapter 1.2 of the Model Regulations reads as follows:

“*Aerosol or aerosol dispenser* means a non-refillable receptacle meeting the requirements of 6.2.4, made of metal, glass or plastics and containing a gas, compressed, liquefied or dissolved under pressure, with or without a liquid, paste or powder, and fitted with a release device allowing the contents to be ejected as solid or liquid particles in suspension in a gas, as a foam, paste or powder or in a liquid state or in a gaseous state;”.
3. In addition, the fourth sentence of section 3.4.2 reads as follows:

“The use of inner packagings is not necessary for the carriage of **articles such as aerosols** or ‘receptacles, small, containing gas’.”
4. Therefore, an aerosol is indeed an article. However, practice has shown that an aerosol is often mistaken for inner packaging of combination packaging, including both the

¹ In accordance with the programme of work of the Sub-Committee for 2013–2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86, and ST/SG/AC.10/40, para. 14).

substance used to dispense the aerosol and the propellant gas itself. This causes problems, especially with regard to the approval of packagings for the transport of aerosols. The situation could be fully clarified quite easily by simply specifying in the definition of aerosol that it is an article.

Proposal

5. In Chapter 1.2, amend the beginning of the definition of aerosol as follows:
“*Aerosol or aerosol dispenser: an article consisting of* a non-refillable receptacle meeting the requirements of 6.2.6 ...”
The rest of the definition remains unchanged.
 6. This clarifies the concept of aerosol and does not require any consequential amendments.
-