

**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

16 April 2013

Forty- third session

Geneva, 24–28 June 2013

Item 5 (d) of the provisional agenda

Transport of gases: miscellaneous

**Amendment of P208 for cylinders used to transport adsorbed  
gases**

**Transmitted by the Government of the United Kingdom**

**Introduction**

1. At the forty-second session of the ECOSOC Sub-Committee of Experts on the Transport of Dangerous Goods (TDG), COSTHA and CGA presented proposals for classification and packaging of adsorbed gases in ST/SG/AC.10/C.3/2012/91 and informal document INF.35 respectively. Following further written comments to COSTHA and an informal discussion, these proposals were amended and finally adopted as set out in INF 69. The effect was to create seventeen new entries on the Dangerous Goods List with associated transport condition, packing and testing provisions.

2. In its paper, COSTHA estimated that there are currently some 160 000 adsorbed gas cylinders in service, many of which are regularly transported internationally. Despite the fact that there have been no reported safety incidents, movements of these cylinders would no longer be possible under the new provisions. This is difficult to justify. The United Kingdom therefore proposes that cylinders manufactured before the new packing instruction comes into force should be allowed to be transported under the new United Nations numbers and in conformance with the new packing instruction.

**Proposal**

3. Amend the new packing instruction P208 to read:

<b>P208</b>	<b>PACKING INSTRUCTION</b>	<b>P208</b>
	This instruction applies to Class 2 adsorbed gases.	
(1)	The following packagings are authorized provided the general packing requirements of 4.1.6.1 are met:	
	(a) Cylinders <b>constructed</b> as specified in Chapter 6.2 and in accordance with ISO 11513:2011 or ISO 9809-1:2010; <b>or</b>	
	(b) <b>Cylinders constructed before 1 July 2015 in accordance with a specification approved by the competent authority.</b>	

## **Justification**

4. These cylinders have been transported internationally for some time, apparently with no reported safety incidents. While standardisation is clearly desirable, it also seems reasonable to allow the industry to continue using existing cylinders.

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