

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

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Item 5 (c) of the provisional agenda

Transport of gases: composite cylinders

Comments on paper ST/SG/AC.10/C.3/2013/9 (EIGA)

Submitted by the International Organization for Standardisation (ISO)

Introduction

1. ISO participated in the working group that is responsible for the proposals in paper ST/SG/AC.10/C.3/2013/9 and supports the intent of the paper entirely. However, on re-reading the proposed text there appears to be a missing element in the marking instructions.

2. In the paper's explanation of the proposed marking relevant to the service life test programme of composite cylinders, paragraph 6 (c) and (d) have the following bullet points:

- Initial service life (15 years from date of manufacture) – marking to be covered permanently if [the type] passes service life test programme (per NOTE 2) – covering (i.e. obscuring) of this marking should be addressed in the service life test programme;
- Once the initial design type has passed the service life test programme requirements, the initial service life no longer needs to be marked for future production.

3. The second bullet point is addressed by a note in the proposed 6.2.2.7.4 (r) which is the paragraph describing the marking for the end date of the first 15 years service life. The mark is valid either

- While the test programme is in progress, or
- On failure of the type to satisfy the test programme.

The note does not explain how the mark shall be treated when the service life test programme shows that the cylinders can be used safely after the date shown.

4. In the opinion of the ISO delegate, it is necessary for the note in 6.2.2.7.4 (r) to explain what happens to this mark if the service life test programme shows that the cylinders are safe for further service. This element of the marking provisions needs to be explicitly included to ensure consistent application.

5. ISO therefore proposes the following addition to the note.

Proposal

6. Amend the note in 6.2.2.7.4 (r) by adding the underlined text.

NOTE: Once the initial design type has passed the service life test programme requirements in accordance with 6.2.2.1.1 NOTE 2, future production no longer requires this initial service life mark. The initial service life mark shall be made unreadable on cylinders of a type that has passed the service life test programme requirements.
