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| **Committee of Experts on the Transport of Dangerous Goodsand on the Globally Harmonized System of Classificationand Labelling of Chemicals 11 November 2020** |
| **Sub-Committee of Experts on the Transport of Dangerous Goods**  |  |
| **Fifty-seventh session** |  |
| Geneva, 30 November-8 December 2020Item 3 of the provisional agenda**Listing, classification and packing** |  |

 Clarification of the scope of UN 1002 AIR, COMPRESSED related to document ST/SG/AC.10/C.3/2020/9

 Transmitted by European Industrial Gases Association (EIGA)

 Introduction

1. This paper provides responses to some comments of delegations during the Sub‑Committee of Experts’ virtual session in June 2020, concerning paper ST/SG/AC.10/C.3/2020/9 Clarification of the Scope of UN 1002.

 Comments and Responses

**C1**. How is the transport of synthetic air currently done, since for the moment it cannot be done under UN 1002 (N.O.S.-entry)?

**R1**. Synthetic air is currently transported under UN 1002 and UN 1956, depending on country and/or company requirements.

EIGA wishes to transport synthetic air and compressed atmospheric air under UN 1002, when used as breathing air or medium for pneumatic tool. The other mixtures of oxygen and nitrogen would be transported under UN 1956, for example for calibration purpose.

**C2.** What was the reasoning behind the deletion of SP 292 in the past? Why does it need to be reintroduced 13 years after the deletion?

**R2.** SP 292 was allowing to transport mixture up to 23.5% of oxygen under UN 1002.

At the time, during the implementation of ISO10156, any gas above 21% was considered as oxidizing. There was an issue as air is not oxidising, and the UN entry did not provide any warning for oxidising hazard.

Later, in the revision of ISO10156, the threshold was increased to 23.5%, removing the need of SP 292.

This is understood why the SP 292 was removed.

**C3.** Why were the cut-off criteria changed to 19.5 – 23.5% oxygen compared to the earlier SP 292 where the mixture could not contain more than 23.5% oxygen? Why was the lower limit introduced?

**R3.** For the upper threshold, 23.5% is consistent with the classification criteria of GHS and ISO10156 for oxidizing gases.

Regarding the lower threshold, this was introduced to ensure that the mixture was not representing an asphyxiation hazard and the OSHA limit was used.

**C4.** Could EIGA confirm that the figures for the amount of oxygen present in the mixture, is the figures used throughout the world. If this is the case, then Sweden supports a new special provision, similar to the previous SP 292.

**R4.** These figures are indeed used throughout the world.

**C5**. This proposal seems unnecessary.

Air is the gaseous mixture of the Earth's atmosphere. Dry air consists mainly of the two gases nitrogen (approx. 20.9 %) and oxygen, i.e. a mixture. Synthetic air, a mixture of 19.5% to 23.5% oxygen and nitrogen, is described very precisely by UN 1002 AIR, COMPRESSED, and can be carried under this UN No. (corresponds to 3.1.3.3). Accordingly, there is no need for a special provision.

**R5.** EIGA believes that on the contrary it is not precisely defined under UN 1002.