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| **Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals 27 November 2020** | |
| **Sub-Committee of Experts on the  Transport of Dangerous Goods** |  |
| **Fifty-seventh session** |  |
| Geneva, 30 November-8 December 2020  Item 3 of the provisional agenda  **Listing, classification and packing** |  |

Modifications concerning Salvage Pressure Receptacles

Transmitted by the European Cylinder Makers Association (ECMA)

Introduction

1. This informal document provides ECMA comments on working document ST/SG/AC.10/C.3/2020/18 presented for the fifty-seventh session of Sub-Committee of Experts on the Transport of Dangerous Goods.

2. ECMA recognize that the development of composite pressure receptacles has seen an increase in their water capacity and working pressures, that will require an appropriate approach for the transportation of damaged, defective, leaking or non-conforming pressure receptacles, for the purpose of recovery or disposal.

3. ECMA recognizes that need to consider the water capacity limit of 1000 litres for pressure receptacles that may be placed in salvage pressure receptacles.

4. The proposal to introduce a limit on the pressure volume product that shall not be exceeded for any type of pressure receptacle is inappropriate in a paper concerning salvage pressure receptacles. It is ECMA’s opinion that an open discussion shall be promoted on the general issue of the limit of maximum stored energy for transportable pressure receptacles, that shall also take into consideration the different approaches that may be adopted to take into account the risks associated to the increasing of pressure to volume product.

Comments on ST/SG/AC.10/C.3/2020/18 proposals:

5. ECMA does not support Proposal 1 or Proposal 2, and proposes that any discussions with regards to limits on stored energy should be held on a separate occasion. ECMA would be pleased to engage in such discussions.

6. ECMA supports Proposal 3 of document ST/SG/AC.10/C.3/2020/18.