

**COMMITTEE OF EXPERTS ON THE TRANSPORT
OF DANGEROUS GOODS**

(Twenty-first session,
Geneva, 4 - 12 December 2000,
agenda item 2(b))

**WORK OF THE SUB-COMMITTEE OF EXPERTS
ON THE TRANSPORT OF DANGEROUS GOODS**

Draft amendments to the Model Regulations

Proper shipping name of the entries for UN Nos. 0503 and 3268
Comments on ST/SG/AC.10/2000/11

Transmitted by the Expert from Norway

1. Introduction

At the last session of the sub-committee, the expert from Japan proposed to include gas generators under the proper shipping names for UN 0503 and UN 3268. After intervention from the expert from Norway, the expert from Japan explained that the article concerned was not a gas generator as such, and offered to give more detailed information to the Committee so that a correct decision could be taken there. The expert from Norway has studied the description given in document ST/SG/AC.10/2000/11, and regrets to inform the Committee that he cannot accept such a device classified under the proper shipping name given for UN 0503 and UN 3268.

According to the description given in the above-mentioned document, these articles are gas generators in the true sense of the term. They are similar to any other gas generator for any purpose within Class 1. By definition they will be explosive articles, containing both a pyrotechnic composition and a nitrocellulose propellant. In the opinion of the expert from Norway, these articles shall be correctly classified as UN 0432 ARTICLES, PYROTECHNIC 1.4S if they successfully pass the 6(c) Test. The proposed term "actuator" is furthermore not technically correct. The way the article is described indicates, as stated above, that it is a proper gas generator, delivering the pressure to an "actuator" performing an activating function.

The Class 9 entry is set up for vehicle components used as "life saving equipment", and in the opinion of the expert from Norway, this entry shall not include the various explosives that go into such components. Norway has concerns for the future credibility of the Committee if it starts basing its recommendations for classification of dangerous substances and articles solely on the need of one particular industries needs for expedient transport of its components from the manufacturer, and not on its principles of classification as given in Chapter 2.1.

Substances and articles of Class 1 are probably the items that have the longest history of regulations, and which have the most stringent legal system applied to them all around the globe. Most countries have separate explosive legislations that automatically will regulate these substances and articles for a variety of applications, often including transport. The way the classification of explosives used in the automotive industry now are dealt with in the Committee are starting to create more problems than it solves in many countries, in particular within the legal framework of the explosives legislations.

The expert from Norway still is of the opinion that it is wrong to give some explosives a special classification just because they are used for a special purpose, while the same type of explosive used in other industry applications (air and space in particular) is still regarded as belonging to Class 1.

The only way that we would see these articles as "not Class 1" are if they fulfil the criteria set out in 2.1.3.5 of the Recommendations.

2. Proposal

The expert from Norway asks the Committee not to accept the proposal for amending the proper shipping name for UN 0503 and UN 3268 as proposed in document ST/SG/AC.10/2000/11, and that the square brackets and the text within the brackets as shown in document ST/SG/AC.10/2000/7 for these two UN numbers are deleted.
