

## 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 7 (a) of the provisional agenda

### MISCELLANEOUS PROPOSALS FOR AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

#### 6.2.2.7 Marking of refillable UN pressure receptacles

Transmitted by the Compressed Gas Association (CGA) and the European Industrial Gases Association (EIGA)

#### **Background**

1. EIGA has transmitted ST/SG/AC.10/C.3/2008/95 and CGA has transmitted UN/SCETDG/34/INF.18. EIGA and CGA have discussed how to address the marking of bundles, noting that there are differing practices between Europe and other parts of the world involving construction standards and approval mechanisms.
2. The specific concern of CGA relates to the marking of a cylinder bundle as a unit. Within the Model Regulations, it is also noted that the current definition of a cylinder bundle does not mention a frame. These relate to the proposals in the second part of Part 1 and in Part 2 of ST/SG/AC.10/C.3/2008/95, as well as the “other comments” (paragraphs 9 to 14) of UN/SCETDG/34/INF.18.
3. There is a draft ISO Standard in preparation for cylinder bundles. It is hoped that this will be published during the next biennium, and this should present an opportunity to review the definition of a cylinder bundle and other aspects of bundles in the Model Regulations.
4. Regarding the other parts of ST/SG/AC.10/C.3/2008/95, that is the first part of Part 1, Part 3 and Part 4; EIGA considers that a minor change to paragraph 15 of UN/SCETDG/34/INF.18 would provide a simple solution.

**Proposals**

5. The proposal is to add at the end of the first paragraph of 6.2.2.7 the following sentence:

“For bundles of cylinders, pressure receptacle marking requirements shall only apply to the individual cylinders of a bundle and not to any assembly structure.

**Justification**

6. These additions will clarify the marking of bundles of cylinders.

**Safety**

7. No safety implications foreseen.

**Feasibility**

8. No specific problem.

**Enforceability**

9. No difficulty in enforcement is envisaged.
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