

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

The life of gas cylinders of composite construction bearing the UN mark

Transmitted by the European Industrial Gases Association (EIGA)

Introduction

1. Reference is made to document ST/SG/AC.10/C.3/2009/7, transmitted by the International Organization for Standardization.
2. Within document ST/SG/AC.10/C.3/2009/7, there is considerable detail on the background on the life of composite cylinders. EIGA supports the proposal within document ST/SG/AC.10/C.3/2009/7 to remove the requirement in Note 1 in 6.2.2.1.1 to design composite gas cylinders for unlimited life.
3. EIGA is aware that the original intention of this ISO paper was to propose a second change to remove Note 2 in 6.2.2.1.1 which requires that composite cylinders shall undergo an unspecified process of requalification after 15 years. This proposal was removed because it contradicted the recommendations for requalification given in the 2002 editions of the three standards covering the design and manufacture of composite cylinders, ISO 11119 Parts 1, 2 & 3 which are referenced in 6.2.2.1.1.
4. Within ISO/TC 58/SC3, *Cylinder design*, these three standards are being revised, and the reference to the requalification of composite cylinders has been removed. Once the revisions to ISO 11119 Parts 1, 2 & 3 are complete, the intention would be to have these latest editions included in the Model Regulations.
5. EIGA has concerns that with the introduction of the new editions of ISO 11119 that Note 2 of 6.2.2.1 will lead to unnecessary restrictions being placed upon the life of composite cylinders.

Proposal

6. As a consequence of the revised standards and the previous discussions held by the Committee of Experts, EIGA sees ST/SG/AC.10/C.3/2009/7 along with the revision of the three parts of ISO 11119 as part of a process to remove Note 2 from 6.2.2.1. At the plenary meeting of ISO/TC58/SC3 held in October 2008, a resolution was taken to propose the removal of Note 2 from 6.2.2.1.

7. EIGA supports this proposal and recommends that an inter-sessional working group is formed that would include experts from the Sub-Committee. EIGA would hope that this inter-sessional working group should take place in a time frame such that both Note 1 would be revised to allow limited life designs and Note 2 would be able to be removed from the 17th revised edition of the Model Regulations. It would not be envisaged that any "face to face" meetings are required and the work would be completed via e-mail and conference calling.
