

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 2 of the provisional agenda

EXPLOSIVES AND RELATED MATTERS

Interpretation - Packing instruction P902 and LP902 assigned to air bag inflators,
air bag modules and seatbelt pretensioners

Transmitted by the expert from Sweden

Introduction

1. Packing instructions P902 and LP902 are assigned to UN 3268, AIR BAG INFLATORS, or AIR BAG MODULES, or SEATBELT PRETENSIONERS. Generally, these articles have to be packed in packagings conforming to the Packing Group III performance level when transported. However, it is possible to carry the articles unpacked under certain conditions. The last sentence in these instructions states:

“The article may also be transported unpacked in dedicated handling devices, vehicles, containers or wagons when moved from where they are manufactured to an assembly plant.”

2. When these instructions were introduced, the manufacturing and assembling of air bags probably took place at the same production site or at least in buildings not too far apart. Today, the situation is different and it seems more common that the factory (production plant) is located in one country and the assembly plant in another.

3. The expert from Sweden has received information that articles assigned to UN 3268 are transported unpacked from the production plant to the assembly plant, even though these plants are very far apart, and even located in different countries. The expert from Sweden is not convinced that this procedure is appropriate for safety reasons, since these articles contain explosives and, as mentioned above, normally have to be packed when transported. Furthermore, according to Special Provision 280, these articles have to be tested as presented for carriage in accordance with Test series 6 (c) of Part I of the *Manual of Tests and Criteria*. If unpacked, the articles might behave differently in the 6(c) test, and, consequently, they would not be assigned to UN 3268.

4. It is proposed that the Sub-Committee consider if it is necessary to clarify the text in P902 and LP902 in order to promote safety and to avoid misinterpretation.

Proposal

5. The intent of this paper is to invite discussion on the issue, and the Sub-Committee is asked to consider if actions should be taken concerning the transport of UN 3268. If the Sub-Committee agrees that the text needs to be revised, Sweden is prepared to draft a proposal for consideration by the Sub-Committee at the following session.
