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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****Sub-Committee of Experts on the Transport of Dangerous Goods****Fifty-fourth session**

Geneva, 26 November-4 December 2018

Item 6 of the provisional agenda

**New proposals for amendments to the Model Regulations  
on the Transport of Dangerous Goods****Bundles of cylinders****Transmitted by the expert from Canada\*****Introduction**

1. This document proposes to delete the last sentence in 4.1.6.1.6 in Chapter 4.1 of the Model Regulations because it conflicts with the requirements in ISO 10961:2010 entitled *Gas cylinders - Cylinder bundles - Design, manufacture, testing and inspection*.

**Proposal**

2. Amend the text of 4.1.6.1.6 as shown. (Deleted text is ~~struck out~~):

“4.1.6.1.6 Pressure receptacles shall be filled according to the working pressures, filling ratios, and other provisions specified in the appropriate packing instruction for the specific substance being filled. Reactive gases and gas mixtures shall be filled to a pressure such that if complete decomposition of the gas occurs, the working pressure of the pressure receptacle shall not be exceeded. ~~Bundles of cylinders shall not be filled in excess of the lowest working pressure of any given cylinder in the bundle.~~”.

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\* In accordance with the programme of work of the Sub-Committee for 2017-2018 approved by the Committee at its eighth session (see ST/SG/AC.10/C.3/100, paragraph 98 and ST/SG/AC.10/44, paragraph 14)

## Justification

3. Paragraph 6.2.2.1.6 requires that the “*design, construction and initial inspection and test of UN bundles of cylinders*” be in compliance with ISO 10961:2010. Section 4.4 of ISO 10961:2010 specifies the following:

*“4.4 Cylinders*

*Cylinders within a bundle shall be suitable for the intended gas service. They shall all have the same test pressure, shall be of similar size and shall conform to the appropriate standards covering individual cylinders.”.*

4. Based on this provision, it is clear that each cylinder within a bundle must have the same test pressure. According to the design and construction standards for cylinders, we know that cylinders with the same test pressure will have the same working pressure. Despite this, the last sentence in 4.1.6.1.6 implies that cylinders within a bundle may not have the same working pressure. The requirements in ISO 10910 should take precedence. This change will eliminate this inconsistency.

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