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   **21 November 2018**

Fifty-fourth session
Geneva, 26 November-4 December 2018
Item 2 (f) of the provisional agenda
Recommendations made by the Sub-Committee on its fifty-first,
fifty-second and fifty-third sessions and pending issues:
miscellaneous pending issues

Comment to ST/SG/AC.10/C.3/2018/71: proposal to include special provision 653 of the ADR in the Model Regulations

Transmitted by the expert from Switzerland

1.   In document ST/SG/AC.10/C.3/2018/71 EIGA proposes to include special provision 653 of the ADR in the Model Regulations. Compared to the text of the ADR, the proposed text has been supplemented to take account of the concerns addressed at the fifty-third session of the UN Sub-Committee (par. 139 of the report ST/SG/AC.10/C.3/106). The second and third indents of the proposal include requirements relating to the packing and filling as follows:

"The special packing provisions for goods of Class 2 in 4.1.6 are met;

The cylinders are inspected prior to filling and are leak tested after filling;".

2.   Switzerland is of the opinion that the proposed additional requirements are not sufficient to ensure a safe transport. In particular, we think that the provisions of packing instruction P200 relating to the filling by qualified staff using appropriate equipment and procedures should be met. This is extremely important in the case of carbon dioxide, where non-qualified staff are more likely to overfill cylinders.

3.   To take account of these requirements, we propose to amend the first indent in the proposal by EIGA as follows:

"The provisions for construction**,** ~~and~~ testing **and filling** of cylinders are observed;"

4.   Finally, we would like to point out that paragraph 4 of the proposal by EIGA does not include UN 1006 Argon, compressed, while special provision 653 of ADR applies to this entry.