

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

Thirty-second session
Geneva, 3-7 December 2007
Item 3 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Exceptions for certain articles containing Division 2.2 gases

Transmitted by the expert from the United States of America

1. At its May, 2007 meeting the ICAO Dangerous Goods Panel Working Group considered a paper submitted by the member nominated by Japan regarding light bulbs containing a pressurized Division 2.2 gas. The paper was submitted in response to industry inquiries relative to whether certain types of pressurized bulbs should be subject to the dangerous goods regulations due to the fact that the internal pressure of several of the bulb designs exceeded 280 kPa at 20 °C. Currently, a number of manufacturers and distributors are uncertain as to the applicability of the dangerous goods regulations to such bulbs. The ICAO Panel was favorable to providing an exception from regulation for such bulbs, on the basis that they pose a minimal risk in transport. However, the Panel ultimately and correctly concluded that the issue should be more appropriately addressed by the UN TDG Sub-Committee in order to ensure that an exception, if adopted, would be applicable to all modes of transport.

2. In examining the issue more closely, it has been noted that a number of common items may exceed the pressure limit provided by 2.2.2.3 of the UN Model Regulations which states:

2.2.2.3 Gases of Division 2.2 are not subject to these Regulations if they are transported at a pressure of less than 200 kPa at 20 °C and are not refrigerated or refrigerated liquefied gases.

3. Items which may in some instances exceed a pressure of 200 kPa at 20 °C include balls used for sports, tires, and light bulbs. It is proposed that exceptions be included in the UN Model Regulations to address these common items which pose a minimal risk in transport. Currently, the existing note to 2.2.1.1 states the following:

NOTE: Carbonated beverages are not subject to these regulations.

4. It is proposed that this note be expanded to include the afore-mentioned items.

Proposal

5. Amend the note to 2.2.1.1 to read as follows:

“NOTE: The following are not subject to these regulations:

- Carbonated beverages
 - Balls used for sports
 - Tires
 - Light bulbs provided they are packaged so that the effects of any rupture of the bulb will be contained within the package.”
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