



**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****Forty-first session**

Geneva, 25 June – 4 July 2012

Item 3 (a) of the provisional agenda

Listing, classification and packing:**Proposals of amendments to the list of dangerous goods of Chapter 3.2****Proposal to amend the description, the proper shipping
name, and the special provisions for UN 0503 (Class 1.4G)
and UN 3268 (Division 9) by an entry on "Safety devices for
vehicles"****Transmitted by the Council on Safe Transportation of Hazardous
Articles (COSTHA)¹****Introduction**

1. The development of life-saving appliances in the automotive industry has made considerable progress since the introduction of UN 3268. The present range of appliances goes well beyond those listed in UN 3268 and UN 0503. For example, they include a number of elements that are actuated by the electric signal of the crash sensor.

Examples include:

- Pyromechanical safety elements which serve to interrupt electric connections. In case of emergency, the main power cable in the vehicle is disconnected from the battery to prevent short circuit and to minimize the risk of fire in the vehicle;
- Pyromechanical actuators which are used for active headrests or for pedestrian protection to release special hinges of the engine hood.

¹ In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

2. These safety device designs cannot be assigned to UN 3268 although they are complying with all Class 9 safety requirements when offered for transport.
3. The following proposal initially aims at amending the entry for UN 3268. This will automatically result in corresponding amendments in the entry for UN 0503.

Proposals

4. **Appendix B GLOSSARY OF TERMS:** the first term and its description (AIR BAG INFLATORS, ...) should be amended to read as follows:

SAFETY DEVICES FOR VEHICLES

Articles which contain pyrotechnic substances or dangerous goods of other classes and are used as life-saving vehicle airbags or seat belts or safety devices. Vehicle safety devices are assembled components for separation, locking, or release-and-drive systems."

5. **Chapter 3.2 Proper shipping names** of UN 0503 and UN 3268 should be amended to read as follows:

"SAFETY DEVICES FOR VEHICLES"

6. **Special Provision 235, UN 0503**, should be amended to read as follows:

"This entry applies to articles which contain Class 1 explosive substances and which may also contain dangerous goods of other classes. These articles are used as safety devices for vehicles, e.g. life-saving vehicle air bag inflators or air bag modules or seat-belt pretensioners or pyromechanical switches or pyromechanical actuators."

7. **Special Provision 280, UN 3268**, should be amended to read as follows:

"This entry applies to safety devices for vehicles e.g. articles which are used as life-saving vehicle air bag inflators, air bag modules or seat-belt pretensioners or pyromechanical switches or pyromechanical actuators and which contain dangerous goods of Class 1 or dangerous goods of other classes and when transported as component parts and if these articles as presented for transport have been tested in accordance with Test Series 6(c) of Part I of the *Manual of Tests and Criteria*, with no explosion of the device, no fragmentation of device casing or pressure vessel, and no projection hazard nor thermal effect which would significantly hinder fire-fighting or emergency response efforts in the immediate vicinity."

8. **Special Provision 289, UN 0503 and UN 3268**, should be amended to read as follows:

"Safety devices for vehicles installed in vehicles or in completed components such as steering columns, door panels, seats etc. are not subject to these Regulations."

Justification

Under Special Provision 280, the above safety devices shall be tested according to the UN 6(c) Test Series and may not be classified under UN 3268 unless they have passed the test satisfactorily. When this is the case, there will be no safety risk. The most solid proof for the validity of this view comes from the positive experience gained in the world-wide transport of articles already classified under UN 3268.

The above proposal is urgently needed for the international automotive industry so as to enable the industry to secure the global logistic network for supply and production and, in particular, for the supply of individual service outlets. This process has become less and less possible in case of the classification under one of the UN numbers of Class 1.