



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
MEETING OF THE WORKING GROUP OF THE WHOLE**

The Hague, 3 to 7 November 2008

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2011/2012 Edition

Agenda Item 2.4: Part 4 — Packing Instructions

2.6 Part 6 — Packaging Nomenclature, Marking, Requirements and Tests

NON-UN SPECIFICATION GAS CYLINDER SPECIFICATIONS

(Presented by G. A. Leach)

SUMMARY

This paper proposes to amend Packing Instruction 200 and/or Part 6;5.5.5 of the Technical Instructions in respect of non-UN specification for gas cylinders.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 An apparent discrepancy has been noted in the Technical Instructions in respect of non-UN specification for gas cylinders.

1.2 The second paragraph of Packing Instruction 200 states the following:

Cylinders other than UN marked and certified cylinders may be used if the design, construction, testing, approval and markings conform to the requirements of the *appropriate national authority in which they are approved and filled*.

However, Part 6; 5.1.1 states the following:

5.1.1.2 In recognition of scientific and technological advances, and recognizing that cylinders and closed cryogenic receptacles other than those that are marked with a UN certification marking may be used on a national or regional basis, cylinders and closed cryogenic receptacles conforming to requirements other than those specified in these

Instructions may be used if approved by the *appropriate national authorities in the countries of transport and use.*”

1.3 Packing Instruction 200 has unusual wording in that it is a State, not an authority, in which a cylinder would be filled. But in any event it is not clear why such an authority would have any relevance to transport as a cylinder could be filled in a State far removed and with no involvement in the intended transport journey and at any time prior. Part 6; 5.1.1 aligns with the UN Model Regulations but as with the authority of filling, it is questioned what relevance the country of “use” has, since presumably this could relate to the State of the consignee (or beyond). It is suggested the appropriate authority of the State of Manufacture may be more appropriate.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to consider the issue raised in this working paper with a view to amend Packing Instruction 200 and/or Part 6;5.5.5 of the Technical Instructions. If changes are agreed a paper will be prepared for WG/09.

— END —