



WORKING PAPER

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

Memphis, 30 April to 4 May 2007

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 2009/2010 Edition

Agenda Item 2.4: Part 4 — Packing Instructions

PACKING INSTRUCTIONS 905 AND 200

(Presented by G. A. Leach)

SUMMARY

Development of recommendations for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2009/2010 Edition.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 UN3072, **Life-saving appliances, not self-inflating** and UN2990, **Life-saving appliances, self inflating** are assigned to Packing Instruction 905.

1.2 DGP-WG/04-WP/11 pointed out that most cylinders used in life jackets and life rafts are not fitted with a pressure relief device and therefore proposed an amendment to Packing Instruction 905, paragraph a) to delete reference to Packing Instruction 200 which requires such pressure relief devices and replace it with the requirement for the cylinders to conform with the requirements of the appropriate national authority of the country in which they are approved and filled.

1.3 Although the proposal was agreed and the applicable deletion and amended text was shown in the Report of WG/05, the Report of DGP/20 omitted to delete the sentence referring to Packing Instruction 200 and so both sentences were included in the 2007-2008 edition of the Technical Instructions. It is suggested that this was an error.

1.4 Although it is likely that most life jacket cylinders and life raft cylinders are either accompanying, or are fitted to, their respective life jackets or life rafts, there are occasions when the cylinders are sent on their own, normally as replacements. On such occasions, the cylinders are to be classified as appropriate for the Division 2.2 gas and therefore are assigned to Packing Instruction 200. However, sub-paragraph 1) of Packing Instruction 200 specifically requires pressure relief devices to be fitted to cylinders used for the transport of UN1013 Carbon dioxide. Therefore, it appears that most carbon dioxide cylinders for life jackets or life rafts can be carried if they are attached to, or are accompanying, the life-saving equipment, but cannot be carried on their own. It is suggested that this was not an intentional consequence of the recent changes to Packing Instruction 200.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to consider deletion of the first sentence of paragraph a) of Packing Instruction 904:

~~“Division 2.2 gases, in cylinders that conform to the requirements of Packing Instruction 200; these may be connected to the life-saving appliance.”~~

2.2 The DGP-WG is also invited to consider the following amendment to sub-paragraph 1) of Packing Instruction 200:

- 1) Pressure relief devices must be fitted on cylinders used for the transport of UN 1013 **Carbon dioxide** and UN 1070 **Nitrous oxide**, except for cylinders containing carbon dioxide designed to be fitted to life-saving appliances, when such cylinders must conform to the requirements of the appropriate national authority of the country in which they are approved and filled. Other cylinders must be fitted ...

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