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| **UN/SCETDG/61/INF.53/Rev.1** |
| **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 2 December 2022**  **Sixty-first session**  Geneva, 28 November-6 December 2022  Item 3 of the provisional agenda  **Listing, classification and packing** |

Comments on document ST/SG/AC.10/C.3/2022/73 and informal document INF.53 – Fire suppression devices that contain a pyrotechnic material

Submitted by the Council on Safe Transportation of Hazardous Articles (COSTHA)

Introduction

1. This informal document is the result of discussions based upon ST/SG/AC.10/C.3/2022/73 and informal document INF.53. By reformatting the text, COSTHA has included all the comments received and believes that we will only need one special provision, as the first paragraph refers to both devices properly classed as 1.4S and Class 9, then additional provisions only relevant to Class 9.

Proposal

2. In 3.2 insert new entries to read as follows:

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| **UN No.** | **Name and description** | **Class or div** | **Sub**  **hazard** | **UN packing group** | **Special**  **provisions** | **Limited and excepted quantities** | | **Packagings**  **and IBCs** | |
| **Packing instruction** | **Special packing provisions** |
| 35XX | Fire suppressant dispersing devices | 9 |  |  | XYZ | 0 | EO | P902 |  |
| 0XXX | Fire suppressant dispersing devices | 1.4S |  |  | XYZ | 0 | E0 | P135 |  |

3. In 3.3.1 add a new special provision XYZ to read as follows:

XYZ Fire suppressant dispersing devices are articles which contain a pyrotechnic substance that is intended to disperse a fire extinguishing agent (or aerosol) when activated and which do not contain any other dangerous goods. These articles, as packaged for transport, shall fulfil the criteria for 1.4S, when tested in accordance with test series 6(c) of Part 1 of the Manual of Tests and Criteria. The device shall be transported with either the means of activation removed or equipped with a means to prevent accidental activation.

Fire suppressant dispersing devices shall only be assigned to Class 9 if the following additional conditions are met:

- the device meets the exclusion criteria in 2.1.3.6.4 (b), (c) and (d)

- The suppressant shall be deemed safe for normally occupied spaces in compliance with international or regional standards (e.g. NFPA2010).

- The article shall be packaged in a manner such that when activated, temperatures of the outside of the package shall not exceed 200 °C.

- This entry shall be used only with the approval of the competent authority of the country of manufacture.

This entry does not apply to “SAFETY DEVICES, electrically initiated” described in special provision 280 (UN 3268).”

4. The entry name in the index should be amended as follows:

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| **Name and description** | **Class** | **UN Number** |
| Fire suppressant dispersing devices | 9 | 35XX |
| Fire suppressant dispersing devices | 1.4S | 0XXX |

5. In 3.3.1 amend special provision 280 by adding the following language at the end:

“This entry does not apply to life saving appliances described in special provision 296 (UN Nos. 2990 and 3072) and fire suppressant dispersing devices (UN Nos. 35XX and 0XXX).”

6. Amend P902 to include: Unpackaged articles:

Except for UN35XX, the articles may also be transported. . . . .

7. In Appendix B, Glossary of Terms, add the following entry:

***“Fire suppressant dispersing devices”***

“Fire suppressant dispersing devices are articles which contain a pyrotechnic substance that is intended to disperse a fire extinguishing agent (or aerosol) when activated and which do not contain any other dangerous goods.”