

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

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Item 3 of the provisional agenda

Listing, classification and packing

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

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

Introduction

1. This informal paper is result of the discussion held in the informal working session on 30 November 2022. This paper intends to amend the proposal in document ST/SG/AC.10/C.3/2022/74 to mitigate the concerns raised by the members of the Sub-Committee.
2. The following amendments have been made to the proposal in document ST/SG/AC.10/C.3/2022/74.
 - (a) Change packing instruction from P003 to P902. Add amendment to P902 to exclude this entry from the option for unpackaged articles. (Expert from Canada)
 - (b) Amended the proper shipping name to “Fire suppressant dispersing device”
 - (c) Amended the special provision to include the definition and assurance that there is no other dangerous goods present: “*Fire suppressant dispersant devices are articles which contain a pyrotechnic substance that are intended to disperse a fire extinguishing agent (or aerosol) when activated and which do not contain any other dangerous goods.*” (Multiple experts)
 - (d) Amended language in special provision regarding the 6(c) test. “*These articles, as presented for transport shall fulfil criteria for 1.4 S, when tested in accordance with test series 6(c) of Part 1 of the Manual of Tests and Criteria.*” (Expert from Sweden)
 - (e) Added a reference to NFPA 2010 to provide context to the phrase “*normally occupied spaces*”. (Expert from Spain)
 - (f) Amended language in special provision to clarify that the products are not automatically classed as Class 9 or Division 1.4S, the process found within manual of tests and criteria must be followed. (Expert from Spain)

Proposal

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

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
35 XX	Fire suppressant dispersing devices	9			XYZ	0	EO	P003 P902	
0X XX	Fire suppressant dispersing devices	1.4S			XZZ	0	E0	P135	

- 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 are intended to disperse a fire extinguishing agent (or aerosol) when activated and which do not contain any other dangerous goods. The article shall only be transported as Class 9 with the means of activation removed, or disconnected with a secondary means of protection to prevent accidental activation. These articles, as presented for transport shall fulfil criteria for 1.4 S, when tested in accordance with test series 6(c) of Part 1 of the Manual of Tests and Criteria. 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 in the event of unintentional activation, temperatures of the outside of the package shall not exceed 200 °C.

Additionally, these devices shall meet the exclusion criteria in 2.1.3.6.4 (b), (c) and (d). Any article not meeting the provisions of this special provision shall be eligible for classification as UN 00XX, Fire suppression dispersing Device, 1.4S in accordance with the Manual of Tests and Criteria. This designation shall be used only with the approval of the competent authority of the country of origin.

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

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

XZZ Fire suppressant dispersing devices shall be transported with the means of actuation removed or disconnected with a secondary means of protection to prevent inadvertent activation.

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

Name and description	Class	UN Number
<u>Fire suppressant dispersing devices</u>	9	35XX
<u>Fire suppressant dispersing devices</u>	1.4S	0XXX

6. 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).”

7. Amend P902 to include: *Unpackaged articles:*

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