



**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**

**2.2: Part 2 — Classification**

**2.3: Part 3 — Dangerous Goods List, Special Provisions and Limited and Excepted Quantities**

**CLASSIFICATION OF ENVIRONMENTALLY HAZARDOUS SUBSTANCES FOR AIR  
TRANSPORT**

(Presented by D. Brennan)

**SUMMARY**

This paper proposes that the panel members consider a revision to the current position that environmentally substances are only classified as dangerous goods when required by the States of origin, transit or destination.

Action by the DGP-WG is in paragraph 2.

**1. INTRODUCTION**

1.1 The panel has for some time taken the view, that substances that only present a risk as hazardous to the environment need only be classified as dangerous goods for air transport, when required so by the State of Origin, transit or destination as set out in Special Provision A97.

1.2 This position has been taken on the basis that, when transported by air these substances do not pose a risk to crew members, passengers or to the aircraft.

1.3 While it's true that when inside an aircraft during flight substances hazardous to the environment pose no risk, all goods transported by air must travel by road to and from the airport. In addition goods transported by air can be damaged during preparation for loading, during loading, unloading and while being handling in an air cargo terminal at destination.

1.4 It is during these processes incident to air transport where freight forwarders, ground handling agents, airline employees and airport personnel need to be aware that, in the event of an

accidental release of any of these substances, that the substance poses a risk to the environment and the spill must be handled accordingly.

1.5 However, in the absence of the appropriate marking and labelling for UN 3077 or UN 3082, personnel responding to the spill will not be aware of the potential risk posed and may not handle the spill in an appropriate manner.

1.6 It is therefore proposed that the provisions of the Technical Instructions with respect to environmentally hazardous substances be aligned with the provisions of the UN Model Regulations.

## 2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to revise Part 2;9.2.1 as adopted into the 2009-2010 edition of the Technical Instructions as follows:

### 9.2 ASSIGNMENT TO CLASS 9

9.2.1 Class 9 includes, inter alia:

- a) Environmentally hazardous substances (aquatic environment) are those that meet the criteria in 2.9.3 of the UN Model Regulations or that meet criteria in international regulations or national regulations established by the appropriate national authority in a ~~country~~ State of origin, transit or destination.

Substances or mixtures dangerous to the aquatic environment not otherwise classified under these Instructions, ~~but classified by the shipper as dangerous goods (see Special Provision A97)~~, must be assigned to Packing Group III and designated:

UN 3077 Environmentally hazardous substance, solid, n.o.s.; or  
UN 3082 Environmentally hazardous substance, liquid, n.o.s.

2.2 The DGP-WG is invited to revise Special Provision A97 to align with the text of UN Special Provision 179 as follows:

- A97 These entries ~~may~~ must be used for substances which are ~~hazardous~~ dangerous to the aquatic environment ~~but or which are marine pollutants that~~ do not meet the classification criteria of any other class or other substance within Class 9. This must be based on the criteria as indicated in 2;9.2.1 a). This designation may also be used for wastes not otherwise subject to these Instructions but which are covered under the *Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal* and for substances designated to be environmentally hazardous substances by the appropriate national authority of the State of Origin, transit or destination which do not meet the criteria for an environmentally hazardous substance according to these Instructions or for any other hazard class.

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