



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

2.3: Part 3 — Dangerous Goods List and Limited Quantities Exceptions

SPECIAL PROVISION A152

(Presented by D. Brennan)

SUMMARY

This paper invites the Panel to consider revising the text of Special Provision A152 to clarify the intent and application.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 Special Provision A152 was introduced into the 2007-2008 Edition of the Technical Instructions to formally recognise that dry shippers with liquid nitrogen fully absorbed into the porous material pose no risk in transport and are therefore not subject to the Technical Instructions.

1.2 Recently however, a question was raised regarding the use of a dry shipper to transport infectious substances in Category B (UN 3373). One regulatory authority expressed an opinion that because of the wording in A152, "... intended for transport, at low temperature, of non-dangerous products are not subject to these Instructions ...", that dry shippers were only "not regulated" when used to transport non-dangerous goods.

1.3 The writer is of the opinion that the dry shipper itself remains "not regulated" for transport, notwithstanding that the substance transported inside a dry shipper may be subject to the Technical Instructions. On that basis the wording of SP A152 should reflect that the dry shipper is "not regulated", but when substances subject to the Technical Instructions are placed inside a dry shipper for transport by air, the provisions applicable to packagings for the regulated substance must be met.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to revise the wording of Special Provision A152 as follows:

A152 Insulated packagings containing refrigerated liquid nitrogen fully absorbed in a porous material ~~and intended for transport, at low temperature, of non-dangerous products~~ are not subject to these Instructions provided the design of the insulated packaging would not allow the build-up of pressure within the container and would not permit the release of any refrigerated liquid nitrogen irrespective of the orientation of the insulated packaging. The words "not restricted" and the special provision number A152 must be provided on the air waybill when an air waybill is issued. When used to transport substances subject to the provisions of these Instructions, the insulated packagings must comply with the packaging requirements applicable to the regulated substance(s).

— END —