



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

2.5: Part 5 — Shipper's Responsibilities

**SELF-REACTIVE SUBSTANCES AND ORGANIC PEROXIDES "KEEP
AWAY FROM HEAT" REQUIREMENTS**

(Presented by D. Brennan)

SUMMARY

The working paper invites discussion on the current requirements applicable to substances with special provisions that require that the substance be kept away from heat.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 Special Provision A20, which requires that substances assigned SP A20 be shaded from direct sunlight, protected from sources of heat and placed in adequately ventilated areas during transport was introduced into the Technical Instructions with effect the 1993-1994 edition. The wording of SP A20 in the Technical Instructions also included a requirement that a statement identifying the need for packages to be protected must be added to the dangerous goods transport document. At that time SP A20 was assigned to a single substance, UN 3241, 2-bromo-2-nitropropane-1,3-diol, which is a Division 4.1 substance in Packing Group III.

1.2 The basis for SP A20 came from the UN Model Regulations, which in adopting UN 3241 had applied SP 246 that specified a packing method and also required that the substance be so protected during transport. Of note is that the UN Model Regulations do not require any annotation on the dangerous goods transport document of the requirement to protect packages during transport.

1.3 The application of SP A20 was expanded in the 1995-1996 Edition of the Technical Instructions to include self-reactive substances in Division 4.1 and Division 5.2, organic peroxides. This

was done on the basis that there was text in what was then Part 5 – Operator’s Responsibilities that required that packages be protected during transport. The text in Part 5 of the Technical Instructions mirrored the text in Part 7 of the UN Model Regulations.

1.4 More recently the panel agreed to adopt a “Keep Away From Heat” handling label that must be applied to packages containing substances to which SP A20 applies. This requirement was proposed to aid operators’ employees in being able to identify packages to which the additional handling requirements applies.

1.5 However, as noted above, while the UN Model Regulations have a number of special provisions that contain wording to the effect that substances must be kept away from heat (SP 132, 246 and 314) and in Part 7 a similar requirement for self-reactive substances in Division 4.1 and for Division 5.2 organic peroxides, there is no requirement in the UN Model Regulations, or in modal regulations for there to be a statement to that effect on the dangerous goods transport document.

1.6 This difference creates a disharmony with respect to the dangerous goods transport document. While it could be argued that air transport is taking a more conservative position in the interests of safety, it could also be argued that packages in air transport are not subject to the same extremes of heat as packages in surface transport and that air transport is being overly conservative.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to consider if the requirement set out in Special Provision A20 and in Part 5;4.1.5.8.3 for the shipper to indicate on the dangerous goods transport document are required, or whether the provisions of the Technical Instructions should be aligned with those of the UN Model Regulations. Based on the response a paper with formal proposals may be brought to DGP-WG09.

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