



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, Special Provisions and Limited and Excepted Quantities

2.5: Part 5 — Shipper's Responsibilities

ENVIRONMENTALLY HAZARDOUS SUBSTANCES

(Presented by G. Leach)

SUMMARY

This paper proposes editorial amendments to ensure that text in the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) relating to environmentally hazardous substances is consistent.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 At DGP/21, following discussion of DGP/21-WP/6, Part 2;9.2.1 of the Technical Instructions was amended to clarify that environmentally hazardous substances are those which meet the classification criteria of 2.9.3 in the UN Model Regulations. The text agreed was as follows:

- 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 national authority in a country of origin, transit or destination.

Substances or mixtures dangerous to the aquatic environment not otherwise classified under these Instructions 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.

1.2 In aligning with the Model Regulations, the text above suggests that all substances meeting the UN criteria must be classified as either UN3077 Environmentally Hazardous Substance, solid, n.o.s or UN 3082 Environmentally Hazardous Substance, liquid, n.o.s. But this is at variance with Special Provision A97, which makes such a classification optional for air transport. Consequently, subsequent to DGP/21, the text was amended as follows:

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 ...

1.3 Unfortunately, there appear to be two consequential changes which were overlooked in the subsequent clarification, namely 5;2.4.9 (special marking provisions) and Special Provision A158 both of which indicate a mandatory status.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to make the following amendments:

a) to Part 5;2.4.9 of the Technical Instructions:

2.4.9 Special marking provisions for environmentally hazardous substances

2.4.9.1 ~~Packages containing environmentally hazardous substances meeting the criteria of 2.9.3 of the UN Recommendations~~ Substances or mixtures dangerous to the aquatic environment not presenting a danger covered by other classes, but classified by the shipper as dangerous goods (UN Nos. 3077 and 3082) (see Special Provision A97) must be durably marked with the environmentally hazardous substance mark with the exception of single packagings and combination packagings containing inner packagings with:

...

b) to Special Provision A158:

A158 (335) Mixtures of solids which are not subject to these Instructions and ~~environmentally hazardous liquids or solids must be classified as UN 3077 and~~ substances or mixtures dangerous to the aquatic environment not presenting a danger covered by other classes, but classified by the shipper as dangerous goods (UN Nos. 3077 and 3082) (see Special Provision A97) may be transported under this entry, provided there is no free liquid visible at the time the substance is loaded or at the time the packaging is closed. Sealed packets and articles containing less than 10 mL of an environmentally hazardous liquid, absorbed into a solid material but with no free liquid in the packet or article, or containing less than 10 g of an environmentally hazardous solid, are not subject to these Instructions.

2.2 It is suggested the changes above could be regarded as editorial and published in an addendum to the 2009-2010 Edition of the Technical Instructions.

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