



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/22)**

Montréal, 21 to 25 November 2022

- Agenda Item 2: Managing air-specific safety risks and identifying anomalies (REC-A-DGS-2025)**
2.2: Develop proposals, if necessary, for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2025-2026 Edition

REVISION OF EXCEPTION FOR UN 3082 IN PACKING INSTRUCTION 964

(Presented by D. Brennan)

SUMMARY

This working paper proposes a revision to the language in Packing Instruction 964 that provides the exception from the pressure differential requirements to packagings containing UN 3082, **Environmentally hazardous substance, liquid, n.o.s.**

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 At DGP-WG/09 and again at DGP/22 there were discussions regarding the need to apply the pressure differential requirements of Part 4;1.1.6 to packagings containing environmentally hazardous substances. At DGP/22 it was agreed to include an exception from the application in Part 4;1.1.6 on the basis that the pressure differential requirements only apply in air transport and environmentally hazardous substances pose no hazard to the aircraft or its occupants, working paper (DGP/22-WP/17 refers) (see paragraph 2.3.2 of the DGP/22 report).

1.2 The change agreed at DGP/22 was to include the following into Packing Instructions 964 and Y964:

"Part 4, Chapter 1 requirements must be met (*with the exception that for UN 3082 the requirements of 4;1.1.6 do not apply*)."

1.3 Recently the International Air Transport Association (IATA) has been made aware that the wording of the exception in Packing Instruction 964 is causing confusion among some shippers who

read this exception to understand it also excepts single packagings from the internal pressure (hydraulic) test requirements described in Part 6;4.5, which is not correct, as the requirement for the hydraulic test applies to all UN specification single and composite packagings intended to contain liquids.

1.4 To remove any chance for confusion it is proposed to clarify the exception by identifying that the exception only applies to inner packagings and that for single or composite packagings the requirements of Part 6;4.5 remain applicable.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to agree to modify the wording of the exception for UN 3082 to identify that while Part 4;1.1.6 does not apply to combination packagings, Part 6;4.5 applies to single and composite packagings, as shown in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENT TO PART 4 OF THE TECHNICAL INSTRUCTIONS

Part 4

PACKING INSTRUCTIONS

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Chapter 11

CLASS 9 — MISCELLANEOUS DANGEROUS GOODS

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Packing Instruction 964

Passenger and cargo aircraft for UN 1941, UN 1990, UN 2315, UN 3151, UN 3082 and UN 3334 only

General requirements

Part 4, Chapter 1 requirements must be met. ~~(with the exception that for UN 3082 the requirements of 4;1.1.6 do not apply).~~ For UN 3082:

- ~~— packed in combination packagings, the requirements of 4;1.1.6 do not apply;~~
- ~~— packed in single or composite packagings, the requirements of 6;4.5 must be met.~~

These requirements include:

- 1) **Compatibility requirements**
 - Substances must be compatible with their packagings as required by 4;1.1.3.
- 2) **Closure requirements**
 - Closures must meet the requirements of 4;1.1.4.

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