



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/23)**

Rio de Janeiro, Brazil, 15 to 19 May 2023

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 TO SPECIAL PROVISION A183

(Presented by D. Brennan)

SUMMARY

This working paper proposes revision to Special Provision A183 to expand application of the special provision to include UN 3292 — **Cells containing sodium**.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 At the twenty-second meeting of the Dangerous Goods Panel (DGP/22, Montréal, 5 to 16 October 2009), a working paper was presented raising concerns at the risks posed by lithium batteries being shipped for recycling, with a proposal to add a new special provision prohibiting lithium batteries in air transport where the batteries were being shipped for recycling (see paragraph 5.4.16 of the DGP/22 Report).

1.2 In the discussion of the working paper at DGP/22, the panel agreed to expand the scope of the proposal to include all batteries, with the result that Special Provision A183 was adopted and assigned to all battery entries in Table 3-1.

1.3 Recently a question was raised at the application of Special Provision A183 to cells being shipped for recycling, in this instance UN 3292— **Cells containing sodium**, which currently does not have A183 assigned.

1.4 While the wording of Special Provision A183 does only refer to “Waste batteries and batteries being shipped for recycling or disposal”, it is believed that not having Special Provision A183

assigned to the entry for cells containing sodium or reference to cells in the wording of A183 is an oversight of omission rather than intentionally limiting application to batteries.

1.5 To address this believed oversight it is proposed to amend the wording of A183 to include reference to cells and to assign A183 against the entry UN 3292 — **Cells containing sodium**.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to consider the amendments proposed to the wording of Special Provision A183 and to assign A183 to the entry UN 3292 — **Cells containing sodium** in Table 3-1.

APPENDIX

PROPOSED AMENDMENT TO PART 3 OF THE TECHNICAL INSTRUCTIONS

Part 3

DANGEROUS GOODS LIST,
SPECIAL PROVISIONS AND
LIMITED AND EXCEPTED QUANTITIES

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Chapter 2

ARRANGEMENT OF THE
DANGEROUS GOODS LIST (TABLE 3-1)

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Table 3-1. Dangerous Goods List

Name	UN No.	Class or division	Subsidiary risk	Labels	State variations	Special provisions	UN packing group	Excepted quantity	Passenger aircraft		Cargo aircraft	
									Packing instruction	Max. net quantity per package	Packing instruction	Max. net quantity per package
1	2	3	4	5	6	7	8	9	10	11	12	13
Cells, containing sodium †	3292	4.3		Danger if wet		A94 A183		E0	492	25 kg	492	400 kg
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Chapter 3

SPECIAL PROVISIONS

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Table 3-2. Special provisions

TIs UN

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A183

Waste cells and batteries and cells or batteries being shipped for recycling or disposal are forbidden from air transport unless approved by the appropriate national authority of the State of Origin and the State of the Operator.

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