



**WORKING PAPER**

**DANGEROUS GOODS PANEL (DGP)  
WORKING GROUP MEETING (DGP-WG/24)**

**Montreal, 21 to 25 October 2024**

**Agenda Item 3: Facilitating safe transport of dangerous goods by air (Ref: REC-A-DGS-2027)**

**NEW SPECIAL PROVISION FOR UN 1544 — ALKALOIDS, SOLID, N.O.S. OR ALKALOID  
SALTS, SOLID, N.O.S.**

(Presented by D. Sylvestre)

**SUMMARY**

With the aim of minimizing any probability of delay or security interference (theft, etc.) in the supply chain, when a controlled substance is in transport and a national law or international convention prohibits disclosure of the technical name, this paper proposes the addition of a new special provision which would indicate to the cargo acceptance staff the reason why the technical name is not present.

**Action by the DGP-WG:** Action by the DGP-WG is in paragraph 2.

**1. INTRODUCTION**

1.1 Air transport of controlled substances is used to reduce the risk of security issues, such as theft, in the supply chain by enabling faster delivery.

1.2 There are presently two references found in the Technical Instructions indicating that the technical or chemical group names are not required, despite the presence of an asterisk in column 1 of the Dangerous Goods List, if a national law or international convention prohibits their disclosure if it is a controlled substance (3;1.2.7.1 and 5;4.1.5.5):

**Part 3**

**1.2.7 Generic or “not otherwise specified” (n.o.s.) names**

1.2.7.1 Generic and “not otherwise specified” proper shipping names, indicated by the inclusion of an asterisk in column 1 of the Dangerous Goods List, must be supplemented with the technical or chemical group names unless a national law or international convention prohibits their disclosure if it is a controlled substance ...

## Part 5

### 4.1.5.5 *Infectious substances and controlled substances*

The dangerous goods transport document must also include the name and telephone number of a responsible person when a national law or international convention prohibits the disclosure of the technical name following an “n.o.s.\*” entry or for infectious substances, UN 2814 and UN 2900.



**Figure 1. Consignment of UN 1544 alkaloid salts, solid, n.o.s. (note the absence of a technical name)**

1.3 The issue is that transport documents currently do not indicate these exemptions, which could lead to delays until it's confirmed that the substance is controlled.

1.4 One industry association, the International Air Transport Association (IATA), has a temporary special provision (A801) to indicate that a national law or international convention prohibits the disclosure of the technical name as it is a controlled substance.

“A801 A technical name is not needed for this entry if it is a controlled substance and a national law or international Convention prohibits its disclosure (see 4.1.2.1(d)).”

NATURE AND QUANTITY OF DANGEROUS GOODS (see sub-section 8.1 of IATA Dangerous Goods Regulations)						
Dangerous Goods Identification				Quantity and Type of packing	Packing Instruction	Authorization
UN Or ID No.	Proper Shipping Name	Class or Division (Subsidiary Risk)	Packing Group			
<b>UN 1544</b>	<b>ALKALOID SALTS, SOLID, N.O.S.</b>	<b>6.1</b>	<b>III</b>	<b>11 PLASTIC DRUM X 20 KG</b>	<b>670</b>	
Additional Handling Information: SPECIAL PROVISION A801 APPLIES SHIPPER'S 24HR EMERGENCY RESPONSE NO. [REDACTED]						

**Figure 2. Extract from the dangerous goods transport document for the consignment of UN1544 alkaloid salts, solid, n.o.s.**

**2. ACTION BY THE DGP-WG**

2.1 The DGP-WG is invited to agree to the amendments proposed in the appendix to this working paper which:

- a) add a new special provision to Table 3-2;
- b) assign the new special provision to UN 1544 — **Alkaloid salts, solid, n.o.s.\*** and UN 1544 — **Alkaloids, solid, n.o.s.\*** in column 7 of Table 3-1; and
- c) add the special provision to the list of those special provisions required to be referred to on the dangerous goods transport document provided in 5;4.1.5.8 b).

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## Chapter 3

### SPECIAL PROVISIONS

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Table 3-2. Special provisions

*TIs*    *UN*

<u>AXXX</u>	<u>The technical or chemical group names are not required to be indicated on a dangerous goods transport document or on the package if a national law or international convention prohibits its disclosure if it is a controlled substance (see 3:1.2.7.1). Transport in accordance with this special provision must be noted on the dangerous goods transport document. The dangerous goods transport document must also include the name and telephone number of a responsible person when a national law or international convention prohibits the disclosure of the technical name (see 5:4.1.5.5).</u>
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## Part 5

### SHIPPER'S RESPONSIBILITIES

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## Chapter 4

### DOCUMENTATION

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#### 4.1.5.8 *Additional requirements*

4.1.5.8.1 The dangerous goods transport document must also contain:

- a) except for radioactive material, the packing instruction applied. For shipments of lithium batteries prepared in accordance with Section IB of Packing Instruction 965 or Packing Instruction 968, the letters "IB" must be added following the packing instruction number;
- b) when applicable, reference to Special Provision A1, A2, A4, A5, A51, A88, A99, A176, A190, A191, A201, A202, A211, A212, A224 ~~or~~, A225 or XXXX;

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