



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)

SPECIAL PROVISION A211

(Presented by B. Firkins)

SUMMARY

This working paper suggests that the provisions set out in Special Provision A211 do not clearly identify the mass limits per receptacle or per package for UN 1067 — **Nitrogen dioxide** and UN 1661 — **Nitric oxide, compressed** when offered for transport as UN 2037 — **Gas cartridges** or **Receptacles, small, containing gas**.

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

1. INTRODUCTION

1.1 At the 25th meeting of the Dangerous Goods Panel (DGP/25), the panel agreed to adoption of a new special provision, A211, to permit the transport of UN 2037 — **Gas cartridges** or **Receptacles, small, containing gas** containing UN 1067 — **Nitrogen dioxide** or UN 1661 — **Nitric oxide, compressed** used for sterilization devices (see paragraph 2.3.4 of the DGP/25 Report).

1.2 Recently, questions have been raised as to the net quantity of gas permitted per inner packaging and per package when Special Provision A211 is being applied for the transport of these gases for use in sterilization devices.

1.3 Special Provision A211, subparagraph a) limits the water capacity of each receptacle or gas cartridge to 30 mL and subparagraph e) limits the aggregate water capacity of all receptacles or gas cartridge in a package to 300 mL.

1.4 However, gases, including when classified as UN 2037, are limited by mass in kilograms and not by volume in millilitres or litres. Yet, there is nothing in Special Provision A211 that identifies the permissible net mass of gas per receptacle or gas cartridge or permissible net mass per package.

1.5 There is scope for confusion on the part of shippers and operator dangerous goods acceptance personnel as subparagraph d) of Special Provision A211 identifies that the outer packaging must be of a type permitted by Packing Instruction 203 meeting Packing Group I performance requirements.

Packing Instruction 203 identifies that UN 2037 is limited to a net quantity of 1 kg on a passenger aircraft and 15 kg on a cargo aircraft. Based on the reference to Packing Instruction 203, it could be inferred that these net quantity per package limits also apply to the gases permitted by Special Provision A211, which is not believed to be correct.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to consider what mass limits should apply to UN 1067 — **Nitrogen dioxide** or UN 1661 — **Nitric oxide, compressed** when these gases are shipped in accordance with Special Provision A211. Based on comments received, a proposal to modify Special Provision A211 will be submitted to DGP-WG/25.

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