



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/25)**

Delhi, India, 21 to 25 April 2025

- Agenda Item 2: Managing air-specific safety risks and identifying anomalies (REC-A-DGS-2027)**
2.3: Develop proposals, if necessary, for amendments to the *Supplement to the Technical Instructions for the Safe Transport of Dangerous Goods by Air (Doc 9284SU)* for incorporation in the 2027-2028 Edition

**SPECIAL PROVISIONS A1 AND A2 AND THE SCOPE OF THE SUPPLEMENT TO THE
TECHNICAL INSTRUCTIONS**

(Presented by T. Muller)

SUMMARY

Different interpretations exist about the scope of the Supplement and the application of the conditions specified in the Supplement in relation to the processing and issuing of approvals as authorized by Special Provisions A1 and A2.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 Looking at the scope of the Supplement, it has been our understanding that it serves as guidance for States when processing approvals and exemptions. Deviations from the conditions proposed in the Supplement in issuing approvals are allowed if an equivalent safety level is maintained.

1.2 Special Provisions A1 and A2, however, specify that the written conditions established by the authorities from the States of Origin and the State of the Operator must include the quantity limitations and packing requirements and these **must** comply with S-3;1.2.2 or S-3;1.2.3 of the Supplement.

1.3 Paragraphs S-3;1.2.2 and S-3;1.2.3 of the Supplement state that the dangerous goods may be transported respectively on a passenger aircraft or on a cargo aircraft only with the prior approval of the appropriate authority of the State of the Origin and the State of the Operator provided that the quantity per package does not exceed the quantity shown in Table S-3-1 and the packing is in accordance with the packing instruction indicated by Table S-3-1.

1.4 The fact that the paragraphs S-3;1.2.2 and S-3;1.2.3 seem to contain mandatory requirements, some authorities are of the opinion that deviating from these requirements of the Supplement

is not allowed. The question could be raised why we do require an approval if the conditions specified in the Supplement are mandatory and must anyway be followed. Some could argue that these conditions could be incorporated directly in the Technical Instructions.

1.5 In addition, the Supplement does not provide for all dangerous goods which may be transported under an approval the necessary packing conditions e.g. Special Provision A2 has been assigned to UN 1752 – **Chloroacetyl chloride**, but no quantity limitations or packing conditions are provided in the Supplement. Some authorities have interpreted that in case no conditions are developed in the Supplement, an exemption may be needed. In our opinion this would make the assignment of A1 or A2 completely redundant.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to discuss and provide comments on the issues raised. Is the working group of the opinion that the Supplement serves only as guidance for the States even in processing and issuing of approvals for dangerous goods which have Special Provisions A1 or A2 assigned? Is the working group of the opinion that guidance and clarification is needed about the scope of the Supplement?

2.2 Depending on the outcome of the discussions, a working paper will be prepared for DGP/30 proposing amendments to the Supplement and/ or the Technical Instructions, as appropriate.

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