



WORKING PAPER

DANGEROUS GOODS PANEL (DGP)

TWENTY-THIRD MEETING

Montréal, 11 to 21 October 2011

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2013-2014 Edition

SPECIAL PROVISION FOR MERCURY IN MANUFACTURED ARTICLES TO ADDRESS TOXIC SUBSIDIARY RISK

(Presented by D. Brennan)

SUMMARY

This working paper proposes the adoption of a new special provision to remove the requirement for shippers to have to apply the toxic subsidiary risk to consignments of mercury contained in manufactured articles.

Action by the DGP: The DGP is invited to adopt a new Special Provision A1xx assigned against UN 3506 as presented in the appendix.

1. INTRODUCTION

1.1 At the 38th meeting of the UN Subcommittee of Experts in December 2010, the Subcommittee agreed to a proposal to assign a Division 6.1 subsidiary risk to UN 2809, Mercury.

1.2 At the same meeting the Subcommittee also agreed to assign a specific UN number (UN 3506) to mercury contained in manufactured articles to address specific air transport concerns that there was a need to be able to separately identify in air transport where the mercury was simply present in manufactured articles rather than being shipped as elemental mercury.

1.3 The need for a specific entry for mercury in manufactured articles was also required as in land and sea transport manufactured articles containing mercury are not subject to the UN Model Regulations when the articles contain not more than 1 kg of mercury. This is set out in Special Provision 366 in the UN Model Regulations. Furthermore, for limited quantity of mercury in manufactured articles the UN has a 5 kg limit per article which means that in surface transport packages could contain articles with up to 5 kg of mercury each without having to bear any hazard labels.

1.4 For air transport the presence of a toxic label on packages requires that operators must segregate these packages from animals, foodstuffs or other edible substances as set out in Part 7;2.8 of the Technical Instructions. For this reason many operators restrict the carriage of packages bearing a Division 6.1 label as managing the segregation requirements can pose significant operational challenges.

1.5 With respect to manufactured articles containing mercury, it is believed that notwithstanding the potential toxicity of the actual mercury that no such toxic risk applies to the actual article in transport. Packing Instruction 869 applicable to mercury in manufactured articles contains requirements to ensure that in the event that the article is damaged that any mercury remains inside the package and therefore the risk of persons or cargo being exposed to mercury is very remote.

1.6 For these reasons, it is proposed to introduce a new special provision to be assigned to UN 3506 that would remove the requirement for Division 6.1 to be shown as a subsidiary risk on the dangerous goods transport document or that packages also bear a toxic hazard label.

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APPENDIX

AMENDMENTS TO 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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Editorial Note.— The proper shipping name, UN number and subsidiary risk shown below align with the proposed amendment presented in DGP/23-WP/6 (*Draft Amendments to the Technical Instructions to Align to the UN Recommendations — Part 3*).

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
Mercury contained in manufactured articles	3506	8	6.1	Corrosive & Toxic		A48 A69 A1xx	III	E0	869	No limit	869	No limit

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Chapter 3

SPECIAL PROVISIONS

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Table 3-2. Special provisions

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A1xx Notwithstanding the Division 6.1 subsidiary risk shown in column 4 of Table 3-1, the toxic subsidiary risk label and an indication of this subsidiary risk on the dangerous goods transport document are not required when the manufactured articles contain not more than 5 kg of mercury.

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