



WORKING PAPER

DANGEROUS GOODS PANEL (DGP)

TWENTY-EIGHTH MEETING

Virtual, 15 to 19 November 2021

Agenda Item 2: Managing air-specific safety risks and identifying anomalies (Ref: REC A DGS 2023)

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 2023-2024 Edition

DELETION OF SPECIAL PROVISION A206

(Presented by D. Brennan)

SUMMARY

This working paper proposes that Special Provision A206 be deleted and changed to be “not used”.

Action by the DGP is in paragraph 2.

1. INTRODUCTION

1.1 The 19th revised edition of the UN Model Regulations adopted a new hazard label specific for packages containing lithium batteries (UN Nos. 3091, 3091, 3480 and 3481). To draw attention to the requirement for the new hazard label, Special Provision 384 was introduced into the Model Regulations to identify the requirement for the application of the lithium battery Class 9 hazard label (Label no. 9A) for packages containing lithium batteries while the miscellaneous dangerous goods label (Label no. 9) was to be used for placarding cargo transport units.

1.2 When harmonizing the ICAO Technical Instructions with Special Provision 384 in the UN Model Regulations, the requirement to placard the cargo transport units was not adopted because it was irrelevant and the note was moved to form part of the mandatory provision of Special Provision A206 (see paragraph 3.2.3.2.1 k) of the DGP-WG/15 report).

1.3 Under normal circumstances, when a note is needed to identify any transition period, it appears in the relevant section of the Technical Instructions rather than being included in a special

provision. However, it is believed that Special Provision 384 in the UN Model Regulations was treated differently due to the difference between labelling a package and placarding a cargo transport unit.

1.4 Since the placarding requirement is irrelevant to the Technical Instructions and the transition period has passed, with the information of the transition period deleted, the only information left in Special Provision A206 is that the hazard label to be used for packages containing lithium batteries (UN Nos. 3090, 3091, 3480 and 3481) is the lithium battery miscellaneous dangerous goods label (Figure 5-26).

1.5 However, as the Technical Instructions has a column (5) in Table 3-1 identifying the applicable hazard label(s), unlike the UN Model Regulations that has no such column, it is not a standard practice to specify the hazard label applicable to different dangerous goods in special provisions but rather through the information in column 5 and then more specifically in Part 5;3. Therefore, Special Provision A206 now appears to be redundant and it is believe should be made “not used”.

2. ACTION BY THE DGP

2.1 The DGP is invited to consider deleting Special Provision A206 as shown in the appendix to this working paper.

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 3

SPECIAL PROVISIONS

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Table 3-2. Special provisions

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A206 ~~(384)~~ The hazard label must conform to the model shown in Figure 5-26. Not used.

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