



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

REVISION TO REQUIRED SPECIAL PROVISION NUMBERS ON TRANSPORT DOCUMENT

(Presented by D. Brennan)

SUMMARY

This working paper proposes revision to Part 5; 4.1.5.8.1 b) with regard to the list of special provision numbers that must be referenced on the dangerous goods transport document.

Action by the DGP: The DGP is invited to consider the revisions to Part 5;4.1.5.8.1 b) and Special Provision A176 as shown in the appendix to this working paper.

1. INTRODUCTION

1.1 At DGP-WG/21 (24 to 28 May 2021), a proposal to revise the list of special provision numbers required to be annotated on the dangerous goods transport document was submitted to address some inconsistencies between Part 5; 4.1.5.8.1 b) and the corresponding special provision in Part 3;3.

1.2 While the proposal was agreed, it was identified the similar annotation requirement for Special Provision A78 should also be reviewed. Currently, Special Provision A78 is included in Part 5;4.1.5.8.1 b) but this special provision does not require the special provision number to be shown on the transport document, and the nature of this special provision does not appear to be essential to be captured on the transport document. Therefore, it is believed that Special Provision A78 should be deleted from the list of special provisions in Part 5; 4.1.5.8.1 b).

A78 (≈172) Where a radioactive material has a subsidiary hazard(s):

- a) The substance must be allocated to Packing Group I, II or III, if appropriate, by application of the packing group criteria provided in Part 2 corresponding to the nature of the predominant subsidiary hazard.
- b) Packages must be labelled with subsidiary hazard labels corresponding to each subsidiary hazard exhibited by the material in accordance with the relevant provisions of 5;3.2; corresponding placards must be affixed to cargo transport units in accordance with the relevant provisions of 5;3.6.
- c) For the purposes of documentation and package marking, the proper shipping name must be supplemented with the name of the constituents which most predominantly contribute to this subsidiary hazard(s) and which must be enclosed in parenthesis. However, where the constituent is listed by name in Table 3-1 and:
 - i) “forbidden” is shown in columns 10 and 11, the dangerous goods transport document must indicate Cargo Aircraft Only and the package must bear cargo aircraft only labels, except that the substance may be shipped on a passenger aircraft with the prior approval of the appropriate authority of the State of Origin and the State of the Operator under the conditions established by those authorities. A copy of the document of approval, showing the quantity limitations and the packaging requirements, must accompany the consignment; and
 - ii) “forbidden” is shown in columns 12 and 13, the substance is forbidden for transport by air except that the substance may be shipped on a cargo aircraft with the prior approval of the appropriate authority of the State of Origin and the State of the Operator under the conditions established by those authorities. A copy of the document of approval, showing the quantity limitations and the packaging requirements, must accompany the consignment.

Radioactive material with a subsidiary hazard of Division 4.2 in Packing Group I must be transported in Type B packages. These may be transported on passenger or cargo aircraft.

- d) The dangerous goods transport document must indicate the class or division of the subsidiary hazard and, where assigned, the packing group as required by 5;4.1.4.1 d) and e).

For packing, see also 4;9.1.5.

1.3 When reviewing the list of special provisions, it was noticed that Special Provision A176 can potentially create challenges to shipment acceptance staff members. This special provision requires the article to have an approval granted by the appropriate national authority before it can be accepted for transport.

1.4 However, instead of requiring the special provision number to be indicated on the transport document, there are options to either indicate that the package was approved by the appropriate national authority or to provide a copy of the appropriate national authority approval. With these options, even if Special Provision A176 has been applied and not shown on the transport document, acceptance staff members could easily overlook the fact that the consignment cannot be accepted for transport.

1.5 Although the content of Special Provision A176 is in line with Special Provision 356 of the UN Model Regulations, it is suggested to revise the documentation requirement that is similar to Special Provision A88.

2. **ACTION BY THE DGP**

2.1 The DGP is invited to consider the revisions to Part 5;4.1.5.8.1 b) and Special Provision A176 as shown in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENT TO PART 3 OF THE TECHNICAL INSTRUCTIONS

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Part 3

**DANGEROUS GOODS LIST, SPECIAL PROVISIONS AND LIMITED
AND EXCEPTED QUANTITIES**

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Chapter 3

SPECIAL PROVISIONS

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- A176 (356) Metal hydride storage systems installed in vehicles, vessels, machinery, engines or aircraft or in completed components or intended to be installed in vehicles, vessels, machinery, engines or aircraft must be approved by the appropriate national authority before acceptance for transport. Transport in accordance with this special provision must be noted on the dangerous goods transport document. The dangerous goods transport document must include an indication that the package was approved by the appropriate national authority or a copy of the appropriate national authority approval must accompany each consignment.

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Part 5

SHIPPER'S RESPONSIBILITIES

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Chapter 4

DOCUMENTATION

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4.1.5 Information required in addition to the dangerous goods description

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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;

Note. – Packing Instruction 622 from the 2019 – 2020 Edition of these Instructions was renumbered as 621 in this edition. Until 31 March 2021, Packing Instruction 622 may continue to be indicated on the dangerous goods transport document when applied to UN 3291, **Biomedical waste, n.o.s.**, **Clinical waste, unspecified, n.o.s.**, **Medical waste, n.o.s.**, or **Regulated medical waste, n.o.s.**

- b) when applicable, reference to Special Provision A1, A2, A4, A5, A51, ~~A78~~, A88, A99, [A176](#), A190, A191, A201, A202, A211 or A212;

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