



NOTA DE ESTUDIO

GRUPO DE EXPERTOS SOBRE MERCANCÍAS PELIGROSAS (DGP)

VIGESIMOCTAVA REUNIÓN

Reunión virtual, 15 - 19 de noviembre de 2021

Cuestión 2: Gestión de los riesgos de seguridad operacional específicos del transporte por vía aérea e identificación de anomalías (Ref: REC-A-DGS-2023)

2.2: Formular propuestas de enmienda de las *Instrucciones Técnicas para el transporte sin riesgos de mercancías peligrosas por vía aérea* (Doc 9284), si se considera necesario, para su incorporación en la edición de 2023-2024

**REVISIÓN DE LOS NÚMEROS DE DISPOSICIÓN ESPECIAL REQUERIDOS
EN EL DOCUMENTO DE TRANSPORTE**

(Nota presentada por D. Brennan)

RESUMEN

En esta nota de estudio se propone revisar la Parte 5; 4.1.5.8.1 b) en lo que respecta a los números de disposición especial que deben indicarse en el documento de transporte de mercancías peligrosas.

Medidas propuestas al DGP: Se invita al DGP a considerar las revisiones de la Parte 5; 4.1.5.8.1 b) y la Disposición especial A176 que se indican en el apéndice de la presente nota de estudio.

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.

APÉNDICE

PROPUESTA DE ENMIENDA DE LA PARTE 3 DE LAS INSTRUCCIONES TÉCNICAS

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Parte 3

LISTA DE MERCANCÍAS PELIGROSAS, DISPOSICIONES ESPECIALES Y CANTIDADES LIMITADAS Y EXCEPTUADAS

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Capítulo 3

DISPOSICIONES ESPECIALES

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- A176 (356) Los dispositivos de almacenamiento con hidruro metálico instalados en vehículos, embarcaciones, maquinaria, motores o aeronaves o en componentes completos o destinados a ser instalados en vehículos, embarcaciones, maquinaria, motores o aeronaves deben ser aprobados por la autoridad nacional que corresponda antes de su aceptación para el transporte. En el documento de transporte de mercancías peligrosas debe señalarse que el transporte se realiza de conformidad con esta disposición especial. Se indicará en el documento de transporte que el embalaje ha sido aprobado por la autoridad nacional que corresponda o se adjuntará a cada envío una copia de la aprobación de la autoridad nacional que corresponda.

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Parte 5

OBLIGACIONES DEL EXPEDIDOR

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Capítulo 4

DOCUMENTOS

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4.1.5 Información requerida además de la descripción de las mercancías peligrosas

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4.1.5.8 Condiciones adicionales

4.1.5.8.1 El documento de transporte de mercancías peligrosas debe contener además:

- a) excepto para material radiactivo, la instrucción de embalaje aplicada. Para las expediciones de baterías de litio preparadas de conformidad con la Sección IB de la Instrucción de embalaje 965 o la Instrucción de embalaje 968, deben añadirse las letras "IB" después del número de la instrucción de embalaje;

*Nota. – La Instrucción de embalaje 622 de la Edición 2019-2020 de las presentes Instrucciones se volvió a numerar como 621 en esta edición. Hasta el 31 de marzo de 2021, puede seguir indicándose la Instrucción de embalaje 622 en el documento de transporte cuando se aplica a ONU 3291, **Desechos (bio)médicos, n.e.p.**, **Desechos clínicos sin especificar, n.e.p.**, **Desechos médicos, n.e.p.** o **Desechos médicos regulados, n.e.p.***

- b) cuando corresponda, la referencia a las disposiciones especiales A1, A2, A4, A5, A51, ~~A78~~, A88, A99, [A176](#), A190, A191, A201, A202, A211 o A212;

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