



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/20)**

Virtual, 19 to 23 October 2020

Agenda Item 2: Managing air-specific safety risks and identifying anomalies

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

REVISIONS TO SPECIAL PROVISION A46

(Presented by D. Brennan)

SUMMARY

This working paper proposes to align the wording of “small inner packagings consisting of sealed packets” in Special Provision A46 with those in Special Provision 216 of the UN Model Regulations.

Action by the DGP-WG: The DGP-WG is invited to consider the revisions to Special Provision A46 as shown in the appendix to this working paper.

1. INTRODUCTION

1.1 Due to the outbreak of coronavirus disease early this year, there was a high demand on alcohol wipes, and many inquiries on consigning them as cargo or carrying them in baggage were received.

1.2 These alcohol wipes are generally small paper towels absorbed with 70% or above alcohol and are either packed individually in a small packet or in bulk inside a larger packaging (e.g. 50 sheets in a plastic bag or a roll of 100 sheets inside a plastic bottle).

1.3 In terms of air transport, depending on how they are packed, many of these alcohol wipes can meet the conditions of Special Provision A46, which allows mixtures of solids that are not subject to the Technical Instructions and flammable liquids to be transported without first applying the classification criteria of Division 4.1 under certain circumstances.

1.4 Upon reviewing Special Provision A46, one of the conditions identified is that the mixtures shall be in “small inner packagings consisting of sealed packets or articles containing less than

10 mL of a Packing Group II or III flammable liquid absorbed into a solid material” and when there is no free liquid in the packet or articles.

1.5 Confusion arose surrounding the wording of “small inner packagings consisting of sealed packets or articles”, with an interpretation between “small inner packagings consisting of sealed packets or small inner packagings consisting of articles” and ““small inner packagings consisting of sealed packets’ or ‘articles’”. “Small inner packagings consisting of articles” can easily be interpreted as alcohol wipes in bulk (e.g. 100 sheets) being the articles inside a plastic bottle (i.e. small inner packaging) are permitted to be transported in accordance with Special Provision A46.

1.6 When reviewing Special Provision 216 in the UN Model Regulations, the wording used is simply “sealed packets and articles containing less than 10 mL of a packing group II or III flammable liquid absorbed into a solid material”.

1.7 The conditions described in Special Provision A46 are very similar to those in Special Provision A158, and the words “sealed packets and articles containing less than 10 mL of an environmentally hazardous liquid, absorbed into a solid material but with no free liquid in the packet or article” are used in Special Provision A158, which are identical to those in Special Provision 335 in the UN Model Regulations.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to consider the revisions to Special Provision A46 as shown in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENT TO PART 7 OF THE TECHNICAL INSTRUCTIONS

Part 3

DANGEROUS GOODS LIST,
SPECIAL PROVISIONS AND
LIMITED AND EXCEPTED QUANTITIES

...

Chapter 3

SPECIAL PROVISIONS

...

Table 3-2. Special provisions

TIs *UN*

...

A46 (≈216) Mixtures of solids which are not subject to these Instructions and flammable liquids may be transported under this entry without first applying the classification criteria of Division 4.1, providing there is no free liquid visible at the time the substance is packaged and, for single packagings, the packaging must pass a leakproofness test at the Packing Group II level. ~~Small inner packagings consisting of sealed packets or~~ and articles containing less than 10 mL of a Packing Group II or III flammable liquid absorbed into a solid material are not subject to these Instructions provided there is no free liquid in the packet or articles.

...

— END —