



**WORKING PAPER**

**DANGEROUS GOODS PANEL (DGP)  
MEETING OF THE WORKING GROUP OF THE WHOLE**

**Beijing, China, 25 October to 3 November 2006**

**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 2009/2010 Edition**

**2.3: Part 3 — Dangerous Goods List and Limited Quantities Exceptions**

**SPECIAL PROVISION FOR NON-RESTRICTED ARTICLES AND  
SUBSTANCES**

(Presented by R. Richard)

**SUMMARY**

This paper invites the DGP-WG to consider adding a new requirement to identify articles or substances which may be transported as non-restricted under certain conditions authorized by special provisions in the Technical Instructions.

Action by the DGP-WG is in paragraph 2.

**1. INTRODUCTION**

1.1 A number of dangerous goods articles are excepted from the full regime of requirements that generally apply to the transport of dangerous goods in the ICAO Technical Instructions (TIs) when certain conditions are met to ensure an appropriate level of safety. An example is non-spillable batteries which are excepted if the conditions in special provision A67 are met. Frequently the ICAO TIs contain more restrictive or additional requirements and conditions that apply for air transport. The special provisions that address these requirements contain packaging provisions, prohibitions, exceptions from requirements for particular quantities or forms of materials. The Dangerous Goods List (DGL) is a key element and primary guide to shippers, carriers, and enforcement personnel in determining compliance with the regulations. Many shippers may not be familiar with the regulations and special requirements for the transportation of dangerous goods by air as some only occasionally ship dangerous goods and, in addition, many commonly ship by surface modes. Frequently, these shippers will offer dangerous goods in the same manner received when the initial mode of transport may have been surface transport. Dangerous Goods can only be safely transported in aircraft when the requirements of the ICAO TIs are strictly followed, and shippers are held accountable for complying with the applicable requirements.

1.2 Shipments of undeclared or improperly prepared dangerous goods, particularly in the air mode, pose a significant safety threat because of the potential for improper packing and handling that could result in releases and failure to communicate the inherent hazard or risk of the materials to emergency responders and transportation workers. Improperly packaged batteries, electrical devices, and articles such as lighters which contain inherent ignition devices can serve as a source of fire if damaged during handling or transport. The issue of undeclared dangerous goods has received significant attention in recent years. The actual number of undeclared hazardous materials shipments is not known but when reported is generally related to an incident or accident in air transport.

1.3 In addition, operator and freight forwarder personnel, particularly those accepting general cargo (non-dangerous goods) are trained to be alert for undeclared or “hidden” dangerous goods. Consignments of packages marked with key words such as “lithium batteries”, “chemicals”, etc. or with markings or labels such as those used by GHS may challenge such consignments and delay their acceptance and uplift while the shipper verifies that the goods are truly “non-restricted”. Infrequent consignors and those that have not received appropriate training must still be aware of the applicable requirements. The airlift acceptance process is based on a system of checks and balances that ensures that dangerous goods are properly prepared in accordance with the ICAO TIs and in full compliance with all applicable safety requirements. When dangerous goods are offered for transport in compliance with all applicable requirements the risk in transport is significantly reduced.

1.4 This paper proposes to require the consignor to indicate the applicable special provision that, when complying with the requirements of that provision, exempts the article or substance from any further provisions of the ICAO TIs. This indication will allow the freight forwarder and operator to verify that the consignor is aware of, and complied with the regulatory requirements. Additionally, it will reduce the likelihood for any unnecessary delays by the carrier by improving communication.

## **2. ACTION BY THE DGP-WG**

2.1 The DGP-WG is invited to agree to add a requirement to indicate on the air waybill, or other transport documentation to indicate that a substance or article meets the conditions for transport specified in the special provision in order to be considered excepted from the requirements of the TIs. This paper offers two options for consideration by the DGP-WG in order to decide on the most appropriate means of applying this new requirement. A list of the applicable articles and substances and the corresponding special provisions that this requirement is proposed to be applied to is provided in the appendix to this paper.

### ***Option 1***

2.2 It is proposed that a special provision be added to Part 3 to require the words “Not Restricted. Complies with XXX”. XXX would be replaced by the applicable special provision number which prescribes requirements or criteria for exception from the provisions of the TIs for an article or substance. The proposed requirement would be included in the description on the air waybill, or other transport documentation. This new special provision would be added to specific Table 3-1 entries which include these conditions in the TIs.

***Option 2***

2.3 It is proposed to indicate the new requirement by adding the following sentence at the end of each Special Provision in Part 3 that provides conditions for exceptions to the TIs as identified in the appendix.

“The Air Waybill, or other transport documentation must indicate that the substance or article meets all applicable requirements of this special provision with the words, “Not Restricted. Complies with XXX.”

XXX would be replaced with the number of the applicable Special Provision.

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APPENDIX

LIST OF SUBSTANCES OR ARTICLES THAT, UNDER CERTAIN  
REGULATORY CONDITIONS, COULD BE CONSIDERED  
“NON-RESTRICTED”

SP	UN #	Proper Shipping Name	Class	Sub Risk
A10	1408	Ferrosilicon	4.3	6.1
A11	2315	Polychlorinated biphenyls, liquid	9	
	3151	Polyhalogenated biphenyls, liquid	9	
	3151	Polyhalogenated terphenyls, liquid	9	
	3152	Polyhalogenated biphenyls, solid	9	
	3152	Polyhalogenated terphenyls, solid	9	
	3432	Polychlorinated biphenyls, solid	9	
A12	1549	Antimony compound, inorganic, solid, n.o.s.	6.1	
	3141	Antimony compound, inorganic, liquid, n.o.s.	6.1	
A15	1689	Magnesium	4.1	
	1689	Magnesium alloys	4.1	
A16	1907	Soda lime	8	
A26	2857	Refrigerating machines	2.2	
A31	2669	Castor beans	9	
	2669	Castor flake	9	
	2669	Castor meal	9	
	2669	Castor pomace	9	
A32	0503	Air bag inflators	1.4G	
	0503	Air bag modules	1.4G	
	0503	Seat belt pretensioners	1.4G	
	3268	Air bag inflators	9	
	3268	Air bag modules	9	
	3268	Seat belt pretensioners	9	
A35	1326	Hafnium powder, wetted	4.1	
	1352	Titanium powder, wetted	4.1	
	1358	Zirconium powder, wetted	4.1	
A41		Permeation devices		
A42	1323	Ferrocium	4.1	
A45	3090	Lithium batteries	9	
	3091	Lithium batteries contained in equipment	9	
	3091	Lithium batteries packed with equipment	9	
A46	3175	Solids containing flammable liquids, n.o.s.	4.1	
A53	1398	Aluminium silicon powder, uncoated	4.3	
A55	2217	Seed cake	4.2	
A60	3242	Azodicarbonamide	4.1	
A61	2212	Blue asbestos	9	
	2212	Brown asbestos	9	
	2590	White asbestos	9	

SP	UN #	Proper Shipping Name	Class	Sub Risk
A67	2800	Batteries, wet, non-spillable	8	
	3171	Battery-powered equipment	9	
	3171	Battery-powered vehicle	9	
A69	1056	Krypton, compressed	2.2	
	2803	Gallium	8	
	2809	Mercury contained in manufactured articles	8	
A70	3166	Engines, internal combustion, flammable gas powered	9	
		Engines, internal combustion, flammable liquid powered	9	
	3166	Vehicle, flammable gas powered	9	
	3166	Vehicle, flammable liquid powered	9	
A71	1403	Calcium Cyanamide	4.3	
A74	2214	Phthalic anhydride	8	
	2698	Tetrahydrophthalic anhydrides	8	
A83	1454	Calcium nitrate	5.1	
A98	1950	Aerosols, non-flammable	2.2	
	2037	Gas cartridges	2.2	
	2037	Receptacles, small, containing gass	2.2	
A103	3358	Refrigerating machines	2.1	
A105	1350	Sulphur	4.1	
A110	3251	Isosorbide-5-mononitrate	4.1	
A114	3164	Articles, pressurized, hydraulic	2.2	
	3164	Articles, pressurized, pneumatic	2.2	
A122	3270	Nitrocellulose membrane filters	4.1	
A129	2426	Ammonium nitrate, liquid	5.1	
A800	1977	Nitrogen, refrigerated liquid	2.2	

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