



WORKING PAPER

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

Auckland, 4 to 8 May 2009

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 2011/2012 Edition

2.2: Part 2 — Classification

ENVIRONMENTALLY HAZARDOUS SUBSTANCES

(Presented by G. A. Leach)

SUMMARY

At WG/08, a proposal to subject environmentally hazardous substances, UN 3077 and UN 3082 to the full requirements of the Technical Instructions was agreed in principle. This working paper proposes certain alleviations for these substances.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 At DGP-WG/08, a proposal for the current optional classification of environmentally hazardous liquid and solid (UN 3082 and UN 3077) to be given mandatory status was agreed (DGP-WG/08-WP/27).

1.2 Substances are classified as either UN 3082 or UN 3077 solely because of their risk to the environment i.e. they are not capable of posing a risk to health, safety or property when transported by air and consequently it is suggested that the applicable requirements of the Technical Instructions should reflect this by allowing alleviations in the following areas:

1.2.1 **Pressure requirements for inner packagings** — for all modes, single packagings containing UN 3082 and UN 3077 are subject to the Leakproofness test and the Internal pressure (hydraulic) test. However, for carriage by air, inner packagings containing UN 3082 and UN 3077 must be capable of withstanding a pressure differential of 95 kPa, but no such requirement applies in the surface modes, where UN 3082 and UN 3077 are carried routinely. It is suggested that given these substances pose no safety risk in air transport there is no justification for the air mode to require inner packagings to be so tested and to so would pose an unjustified impediment to multi-modal transport.

1.2.2 **Acceptance check** — an acceptance check is not required for UN 3373 (Biological substance, Category B). It is suggested UN 3082 and UN 3077 pose an even lesser risk and should not be subject to this requirement.

1.2.3 **NOTOC** — advising the Captain of the presence of UN 3077 or UN 3082 is of no benefit to him/her and so it is suggested a NOTOC should not be required.

1.2.4 **Transport document** — for UN 3373 (Biological substance, category B) and UN 1845 (Dry ice) no dangerous goods transport document is required, but instead the information can be provided on alternative written document (such as an air waybill). It is suggested this would also be acceptable for UN 3082 and UN 3077.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to consider the following proposed changes to the Technical Instructions (note – the new Packing Instructions have been used):

2.1.1 Amend Packing Instruction 964 as follows:

General requirements

Except for UN 3082 when the requirements of 4;1.1.6 do not apply, Part 4, Chapter 1 requirements must be met, including:

...

and insert the following text at the end of the Packing Instruction:

For UN 3082 the dangerous goods transport document requirements of 5;1 are not applicable provided alternative written documentation is supplied describing the contents. The information required is as follows and should be shown in the following order: UN 3082, Environmentally hazardous substance, liquid, n.o.s. (supplemented with the technical name in parenthesis), 9 (the word "Class" may be included prior to the number "9") and the number of packages.

2.1.2 Amend Packing Instruction Y964 as follows:

General requirements

Except for UN 3082 when the requirements of 4;1.1.6 do not apply, Part 4, Chapter 1 requirements must be met, including:

...

and insert the following text at the end of the Packing Instruction:

For UN 3082 the dangerous goods transport document requirements of 5;1 are not applicable provided alternative written documentation is supplied describing the contents. The information required is as follows and should be shown in the following order: UN 3082, Environmentally hazardous substance, liquid, n.o.s. (supplemented with the technical name in parenthesis), 9 (the word "Class" may be included prior to the number "9") and the number of packages.

2.1.3 Amend Packing Instruction 956 by adding the following text at the end of the packing instruction as follows:

For UN 3077 the dangerous goods transport document requirements of 5;1 are not applicable provided alternative written documentation is supplied describing the contents. The information required is as follows and should be shown in the following order: UN 3077, Environmentally hazardous substance, solid, n.o.s. (supplemented with the technical name in parenthesis), 9 (the word "Class" may be included prior to the number "9") and the number of packages.

2.1.4 Amend Packing Instruction Y956 by adding the following text at the end of the Packing Instruction as follows:

For UN 3077 the dangerous goods transport document requirements of 5;1 are not applicable provided alternative written documentation is supplied describing the contents. The information required is as follows and should be shown in the following order: UN 3077, Environmentally hazardous substance, solid, n.o.s. (supplemented with the technical name in parenthesis), 9 (the word "Class" may be included prior to the number "9") and the number of packages.

2.1.5 Amend Part 3;5.1.1 c) as follows:

5.1.1 Excepted quantities of dangerous goods of certain classes, other than articles, meeting the provisions of this chapter are not subject to any other provisions of these Instructions except for:

- a) the training requirements in 1;4;
- b) the classification procedures and packing group criteria in Part 2; and
- c) the packaging requirements of 4;1.1.1, 4;1.1.3.1, 4;1.1.5, 4;1.1.6 and 4;1.1.7. Part 4;1.1.6 does not apply to UN 3082.

2.1.6 Insert a new Part 7;1.3.2 (acceptance check) as follows:

1.3.2 The requirements of 7;1.3.1 do not apply to UN 3077 or UN 3082.

2.1.7 Insert a new Part 7;4.1.3 (NOTOC) as follows:

4.1.3 For UN 3077 or UN 3082, the requirements of 4.1.1 do not apply.