



WORKING PAPER

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

Abu Dhabi, United Arab Emirates, 7 to 11 November 2010

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 2013/2014 Edition

2.2: Part 2 — Classification

AVIATION REGULATED MATERIALS

(Presented by the Dangerous Goods Advisory Council)

SUMMARY

This paper proposes to clarify the classification of aviation regulated liquids or solids.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 With the introduction of criteria for Environmentally Hazardous Substances (EHS) in the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284), it has become somewhat unclear as to how aviation regulated liquids or solids assigned to UN 3334 or 3335 and also meeting the EHS criteria should be classified.

1.2 In relation to EHS, Part 2;9.2.1 a) of the Technical Instructions states:

Substances or mixtures dangerous to the aquatic environment not otherwise classified under these Instructions must be assigned to Packing Group III and designated:

UN 3077 Environmentally hazardous substance, solid, n.o.s.; or
UN 3082 Environmentally hazardous substance, liquid, n.o.s.

...

1.3 Some may argue that assignment to UN 3334 or 3335 is not classification as there are no quantitative classification criteria. At the same time Special Provision A27, assigned to UN 3334 or 3335 begins with:

A27 (276) This includes any substance which is not covered by any of the other classes ...

1.4 Proper classification is clear in the UN Model Regulations. The UN text in 2.9.2 in relation to EHS states:

“These designations are used for substances and mixtures which are dangerous to the aquatic environment that do not meet the classification criteria of any other class or another substance within Class 9.”

1.5 From the UN text, it is clear that substances which meet the criteria for aviation regulated substances and also meeting EHS criteria should be classified as UN 3334 or 3335. It should also be noted that this same logic applies to other named substances in Class 9. This approach also appears to provide greater safety in comparison to the alternative approach. On an aircraft, communicating the presence of an aviation regulated substance communicates more relevant information to the pilot than communicating the presence of an EHS.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to agree to the proposed amendment to Part 2;9.2.1 below in order to provide clarity and consistency with multimodal provisions:

9.2 ASSIGNMENT TO CLASS 9

1. 9.2.1 Class 9 includes, inter alia:

- a) Environmentally hazardous substances (aquatic environment) are those that meet the criteria in 2.9.3 of the UN Model Regulations or that meet criteria in international regulations or national regulations established by the appropriate national authority in the State of Origin, transit or destination.

Substances or mixtures dangerous to the aquatic environment ~~not otherwise classified under these instructions~~ that do not meet the classification criteria of any other class or another substance within Class 9 must be assigned to Packing Group III and designated:

UN 3077 Environmentally hazardous substance, solid, n.o.s.; or
UN 3082 Environmentally hazardous substance, liquid, n.o.s.

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