



**WORKING PAPER**

**DANGEROUS GOODS PANEL (DGP)**

**TWENTIETH MEETING**

**Montréal, 24 October to 4 November 2005**

**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 2007-2008 Edition**

**ENVIRONMENTALLY HAZARDOUS SUBSTANCES  
(SP A97 AND PACKING INSTRUCTIONS 911 AND 914)**

(Presented by K. Vermeersch)

**1. INTRODUCTION**

1.1 As a consequence of the alignment of the Technical Instructions with the UN Recommendations classification criteria have been added for Environmentally hazardous substances to Part 2; 9.2.1(see WP 5 page 16) which read as follows:

Class 9 includes, inter alia

- a) Environmentally hazardous substances are those that meet the criteria in 2.9.3 of the UN Model Regulations or that meet criteria in national or international regulations established by the national authority in a country of origin, transit or destination. See Part 3, Chapter 3, special provision A97

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.**

1.2 In addition new special marking provisions have been introduced for environmentally hazardous substances as specified in WP 8 page 4 (ICAO new paragraph Part 5; 2.4.9).

1.3 During WG 5 however, a decision has been taken to modify Special Provisions A 97 as follows (see also WP 6 page 3):

“These entries **may** be used for substances which are hazardous to the environment but do not meet the classification criteria of any other class or substance with Class 9. This must be based on the criteria in the Regulations of other modes of transport or criteria recognized by the appropriate authority of the State of origin, transit or destination. This designation may also be used for wastes not otherwise subject to these Instructions, but which are covered under the *Basle Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal*.”

1.4 As a result of this change it is the shipper’s decision if classified environmentally hazardous substances will be shipped as dangerous goods or not.

1.5 In my opinion this is inconsistent with the new imposed classification criteria and marking requirements (if adopted by this Meeting) and will create additional multimodal problems.

1.6 In order to remove this inconsistency, to enhance multimodal transport of environmentally hazardous substances and to align with the UN recommendations following proposals are made.

## 2. PROPOSAL

2.1 Amend Special Provision A 97 as follows:

“These entries must be used for substances and mixtures which are dangerous to the environment but do not meet the classification criteria of any other class or substance with Class 9 and which are classified in accordance with Part 2; 9.2.1. This designation may also be used for wastes not otherwise subject to these Instructions, but which are covered under the *Basle Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal*.”

2.2 As these substances pose no significant hazard to the aircraft, passengers or crew an alignment of the quantities allowed per inner packaging with the modal regulations in the appropriate packing instructions (PI 911 and PI 914) would facilitate the movement of these substances through all the modes:

Amend PI 911 and PI 913 as proposed in Working Paper 19.

In addition an alignment of the Limited Quantity Packing Instructions with the Quantity limitations for Limited Quantities in the other modes would also assist shippers having standard multimodal packagings.

Amend PI Y911 as follows:

Glass or earthenware (IP.1)	<del>1 kg</del> <u>5 kg</u>
Plastic (IP.2)	<del>2 kg</del> <u>5 kg</u>
Metal (IP3, IP.3A)	<del>2 kg</del> <u>5 kg</u>

Paper (IP.4)	<del>1 kg</del> <u>5 kg</u>	
Plastic bag (IP.5)	<del>1 kg</del> <u>5 kg</u>	
Fibre (IP.6)	<del>1 kg</del> <u>5 kg</u>	
Glass ampoule (IP.8)	0.5 kg	
Paper, plastic/ aluminium(IP. 10)	<del>1 kg</del> <u>5 kg</u>	

Amend PI Y914 as follows:

Glass or earthenware (IP.1)	<del>1 L</del> <u>5 L</u>	
Plastic (IP.2)	<del>1 L</del> <u>5 L</u>	
Metal (IP3, IP.3A)	<del>2 L</del> <u>5 L</u>	
Glass ampoule (IP.8)	0.5 L	

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