



WORKING PAPER

DANGEROUS GOODS PANEL (DGP)

TWENTY-FIFTH MEETING

Montréal, 19 to 30 October 2015

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 2017-2018 Edition

SPECIAL PROVISION A104

(Presented by T. Muller)

SUMMARY

This working paper proposes the removal of Special Provision A104 from Part 3 of the Technical Instructions.

Action by the DGP: The DGP is invited to:

- a) add “& Toxic” to column 5 of Table 3-1 against the entry for UN 1230 — **Methanol**;
- b) delete Special Provision A104 from column 7 of Table 3-1 against the entry for UN 1230 — **Methanol**; and
- c) delete Special Provision A104 from Part 3;3.3

as shown in the appendix to this working paper.

1. INTRODUCTION

1.1 Many years ago, the requirement for a toxic subsidiary risk label for UN 1230 — **Methanol** was removed and Special Provision A104 was assigned. Special Provision A104 contains the following text: “A toxic subsidiary risk label, although not required by these Instructions, may be applied.”

1.2 The reason for the assignment of this Special Provision to Methanol in the past was that this chemical was used in many industrial products, such as screen washer and anti-freezing fluids and cleaning agents and therefore often was carried as cargo on aircraft. Until changes were introduced to the

current edition of the Technical Instructions, Part 7:2.9 prohibited the carriage of substances requiring a subsidiary risk “Toxic” label in the same compartment of an aircraft as animals, substances marked as or known to be foodstuffs, feeds or other edible substances intended for consumption by humans or by animals therefore applied to all substances classified as UN 1230 Methanol.

1.3 This prohibition was removed from Part 7;2 of the 2015-2016 Edition of the Technical Instructions (see DGP/24-WP/3, paragraph 3.2.44 and paragraph 2.7.1.1 of the report of DGP/24). Hence, the need for Special Provision A104 in the Technical Instructions has become redundant.

1.4 It must be noted that the UN Model Regulations do not contain a special provision with similar text, which leads to problems with multimodal consignments, e.g. shipments that are shipped by sea applying the IMDG code and by air, applying the Technical Instructions. A toxic subsidiary risk label is required in the regulations for all other modes of transport.

2. ACTION BY THE DGP

2.1 The DGP is invited to:

- d) add “& Toxic” to column 5 of Table 3-1 against the entry for UN 1230 — **Methanol**;
- e) delete Special Provision A104 from column 7 of Table 3-1 against the entry for UN 1230 — **Methanol**; and
- f) delete Special Provision A104 from Part 3;3.3

as shown in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENT TO PART 3 OF THE TECHNICAL INSTRUCTIONS

Part 3

DANGEROUS GOODS LIST,
SPECIAL PROVISIONS AND
LIMITED AND EXCEPTED QUANTITIES

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Chapter 2

ARRANGEMENT OF THE
DANGEROUS GOODS LIST (TABLE 3-1)

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Table 3-1. Dangerous Goods List

Name	UN No.	Class or division	Subsidiary risk	Labels	State variations	Special provisions	UN packing group	Excepted quantity	Passenger aircraft		Cargo aircraft	
									Packing instruction	Max. net quantity per package	Packing instruction	Max. net quantity per package
1	2	3	4	5	6	7	8	9	10	11	12	13
Methanol	1230	3	6.1	Liquid flammable & Toxic		A404 A113	II	E2	352 Y341	1L 1L	364	60 L
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Chapter 3

SPECIAL PROVISIONS

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Table 3-2. Special provisions

TIs	UN
A104	A toxic subsidiary risk label, although not required by these Instructions, may be applied.
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