



**WORKING PAPER**

**DANGEROUS GOODS PANEL (DGP)**

**TWENTY-SIXTH MEETING**

**Montréal, 16 to 27 October 2017**

**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 2019-2020 Edition**

**REVISION TO SPECIAL PROVISION A78**

(Presented by D. Brennan)

**SUMMARY**

This working paper proposes a revision to Special Provision A78 to address the transport of radioactive materials with a subsidiary hazard where the listed constituent is forbidden on cargo aircraft and/or passenger aircraft.

**Action by the DGP:** The DGP is invited to consider revising Special Provision A78 as shown in the appendix to this working paper.

**1. INTRODUCTION**

1.1 Special Provision A78 sets out the provisions that apply where a radioactive material has one or more subsidiary hazards. These provisions include requirements that the shipper must identify with the proper shipping name of the radioactive material the name of the constituent that most predominantly contributes to the subsidiary hazard(s). The name of the constituent must be added in parenthesis following the proper shipping name.

1.2 There is a paragraph at the end of A78 that identifies that where the subsidiary hazard meets the classification criteria for certain divisions that additional requirements or restrictions apply. For example if the subsidiary hazard is in Division 2.1 the radioactive material is forbidden on a passenger aircraft.

1.3 What is not stated in Special Provision A78 is what applies should a specific constituent be forbidden for transport on a passenger aircraft or on both passenger and cargo aircraft. Here it is believed that there should be text to clearly state that if the constituent is forbidden that the radioactive material is similarly restricted, unless Special Provision A1 or A2 is assigned against the listed substance,

in which case the approval requirements of A1 or A2 apply, i.e. approval by the State of Origin and State of the Operator.

**2. ACTION BY THE DGP**

2.1 The DGP is invited to consider revising the wording of Special Provision A78 as shown in the appendix to this working paper.

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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 3

SPECIAL PROVISIONS

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Table 3-2. Special provisions

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A78 (≈172) Where a radioactive material has a subsidiary risk(s):

- a) The substance must be allocated to Packing Group I, II or III, if appropriate, by application of the packing group criteria provided in Part 2 corresponding to the nature of the predominant subsidiary risk.
- b) Packages must be labelled with subsidiary risk labels corresponding to each subsidiary risk exhibited by the material in accordance with the relevant provisions of 5;3.2; corresponding placards must be affixed to cargo transport units in accordance with the relevant provisions of 5;3.6.
- c) For the purposes of documentation and package marking, the proper shipping name must be supplemented with the name of the constituents which most predominantly contribute to this subsidiary risk(s) and which must be enclosed in parenthesis. However, where the constituent is listed by name in Table 3-1 and:
  - i) “forbidden” is shown in columns 10 and 11, the dangerous goods transport document must indicate Cargo Aircraft Only and the package must bear cargo aircraft only labels, except when A1 is shown in column 7 when the substance may be shipped on a passenger aircraft with the prior approval of the appropriate authority of the State of Origin and the State of the Operator under the conditions established by those authorities. A copy of the document of approval, showing the quantity limitations and the packaging requirements, must accompany the consignment;
  - ii) “forbidden” is shown in columns 12 and 13, the substance is forbidden for transport by air except when A2 is shown in column 7 when the substance may be shipped with the prior approval of the appropriate authority of the State of Origin and the State of the Operator under the conditions established by those authorities. A copy of the document of approval, showing the quantity limitations and the packaging requirements, must accompany the consignment.
- d) The dangerous goods transport document must indicate the subsidiary class or division and, where assigned, the packing group as required by 5;4.1.4.1 d) and e).

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For packing, see also 4;9.1.5.

Radioactive material with a subsidiary risk of Division 4.2 (Packing Group I) must be transported in Type B packages. Radioactive material with a subsidiary risk of Division 2.1 is forbidden from transport on passenger aircraft, and radioactive material with a subsidiary risk of Division 2.3 is forbidden from transport on passenger or cargo aircraft except with the prior approval of the appropriate authority of the State of Origin and the State of the Operator under the conditions established by those authorities. A copy of the document of approval, showing the quantity limitations and the packaging requirements, must accompany the consignment.

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