

**NOTE DE TRAVAIL****GROUPE D'EXPERTS SUR LES MARCHANDISES DANGEREUSES (DGP)****VINGT-SIXIÈME RÉUNION****Montréal, 16 – 27 octobre 2017**

Point 2 : Élaboration de recommandations relatives à des amendements des *Instructions techniques pour la sécurité du transport aérien des marchandises dangereuses* (Doc 9284) à introduire dans l'édition de 2019-2020

INSTRUCTION D'EMBALLAGE 958 : N° ONU 2590

(Note présentée par Adrian Tusek)

RÉSUMÉ

Il y a un certain nombre de divergences entre les Instructions techniques et les Recommandations de l'ONU en ce qui concerne l'emballage de l'amiante.

L'instruction d'emballage 958 s'applique aux engrais au nitrate d'ammonium ainsi qu'à l'**amiante, chrysotile**, n° ONU 2590.

La présente note propose de supprimer de l'instruction d'emballage 958 la mention de l'**amiante, chrysotile**, n° ONU 2590, et de créer deux nouvelles instructions d'emballage uniformisées avec celles du Règlement type de l'ONU.

Suite à donner par le Groupe DGP : Le Groupe DGP est invité à examiner les instructions d'emballage proposées en appendice.

1. INTRODUCTION

1.1 A number of inconsistencies between the ICAO Technical Instructions and Packing Instruction 958 with respect to asbestos were identified and a new packing instruction was proposed at the seventeenth working group meeting of the Dangerous Goods Panel (DGP-WG/17, Montréal, 24 to 28 April 2017) to address them.

1.2 The following inconsistencies were identified and set out in the report of the by the working group (see paragraph 3.2.4.4 of the DGP-WG/17 report):

* Seuls le résumé et les appendices sont traduits.

- a) Combination packagings were not provided for in Packing Instruction 958, the packing instruction assigned to UN 2590 — **Asbestos, chrysotile**. The UN Model Regulations does allow for them. It was agreed that not allowing them was likely unintentional and that there would be no reason not to allow them for transport by air.
- b) The maximum quantity permitted per single packaging was 200 kg for UN 2590 Asbestos, chrysotile but was limited to 120 kg for jerricans and 50 kg for bags in the UN Model Regulations. It was noted that the 200 kg limit applied to all allowable packagings in Packing Instruction 958 and that specific limits for each type of packaging were not provided. The maximum net mass for steel and plastic Jerricans was 120 kg and for bags was 50 kg by design in accordance with Part 6, so specifying a lower limit for these packagings would be unnecessary within the structure of the Technical Instructions.
- c) Certain types of single packagings with a removeable head were permitted in accordance with the UN Model Regulations but not in the Technical Instructions. It was suggested that only permitting non-removeable heads in the Technical Instructions was intentional.
- d) A particular packing provision was assigned to UN 2590 and UN 2212 in the UN Model Regulations allowing bags, provided they were transported in closed cargo transport units or placed in closed rigid overpacks which was not included in the Technical Instructions. It was suggested that this was also intentional, recognizing that closed cargo transport units were not permitted for transport of dangerous goods by air. There were specific requirements for bags to be palletized and unitized in Packing Instruction 958.
- e) UN 2212 — **Asbestos, amphibole** was forbidden for transport on both passenger and cargo aircraft. It was questioned whether this was justified. The working group wanted to assess the original reasoning for forbidding it before making a decision.
- f) The UN Model Regulations permitted transport of asbestos in limited quantities but there were no provisions for limited quantities in the Technical Instructions. A new limited quantity packing instruction for UN 2590 — **Asbestos, chrysotile** was also proposed. There were no comments on this proposal, other than the need for a revision to the maximum net quantity per package limit for limited quantities should the DGP agree to adopt the packing instruction.

1.3 The following inconsistencies were identified and set out in the DGP-WG/17 report (see paragraph 3.2.4.4):

- a) No changes based on 1.2 a);
- b) The inclusion of reference to a 60 kg limit for plastic boxes (4H1) and 120 kg limit for Jerricans (3A1, 3A2, 3B1, 3B2, 3H1, 3H2) has been deleted from the proposed packing instruction. See 1.2 b);
- c) The working group believed that only permitting single packagings with a non-removable head (see 1.2 c) above) was intentional. I have been unable to

find information that supports this position and have retained the ability to use removable head single packagings in this proposal;

- d) Based on the comments in 1.2 d) the ability to use bags in single packagings has been deleted;
- e) In response to 1.2 e), the original reason for listing UN 2212 **Asbestos, amphibole** “forbidden” in the Technical Instructions was not ascertained. Historically, it was the case that UN 2212 Asbestos, amphibole was thought to be a greater health hazard than UN 2590 **Asbestos, chrysotile** but has since been shown not to be the case and both are equally harmful. The UN Model Regulations does not treat either differently for packaging or transport. In 2.9.2 Assignment to Class 9 in the UN Model Regulations it states “Substances which, on inhalation as fine dust, may endanger health” and lists both UN 2212 and UN 2590. Similar wording does not exist in the Technical Instructions. However, there appears to be no reason why UN 2212 should be treated differently to UN 2590 with regard to the hazard to health from fine dust and this hazard is mitigated by the packing method for both; and
- f) In response to 1.2 f), the UN Model Regulations applies a 5 kg maximum net quantity per inner packaging to UN 2212 and UN 2590. However, in air transport, it would not be unreasonable to set a maximum net quantity per package of 1 kg as this would support the asbestos testing industry as samples for testing are usually small in size even when multiple samples from a site are combined.

2. ACTION BY THE DGP

2.1 The DGP is invited to consider and adopt a revised Packing Instruction 958 that adopts the packing requirements of the UN Model Regulations applicable to UN 2590. The proposed new Packing Instruction 9XX and Y9XX are shown at Appendix B to this working paper.

APPENDICE A

PROPOSITION D'AMENDEMENT DE LA PARTIE 3 DES INSTRUCTIONS TECHNIQUES

Partie 3

LISTE DES MARCHANDISES DANGEREUSES, DISPOSITIONS PARTICULIÈRES ET QUANTITÉS LIMITÉES ET EXEMPTÉES

(...)

Chapitre 2

AGENCEMENT DE LA LISTE DES MARCHANDISES DANGEREUSES (TABLEAU 3-1)

(...)

Tableau 3-1. Liste des marchandises dangereuses

Matière ou objet	N° ONU	Classe ou division	Risques subsidaires	Étiquettes	Divergences des Etats	Dispositions particulières	Groupe d'emballage ONU	Quantité exemptée	Aéronefs de passagers et aéronefs cargos		Aéronefs cargos seulement	
									Instruction d'emballage	Quantité nette maximale par colis	Instruction d'emballage	Quantité nette maximale par colis
1	2	3	4	5	6	7	8	9	10	11	12	13
(...)												
Amiante, chrysotile †	2590	9		Marchandises diverses	US 4	A61	III	E1	9589XX Y9XX	200 kg 1 kg	9589XX	200 kg
Amiantes, amphiboles* (amosite, trémolite, actinolite, anthophyllite, crocidolite)†	2212	9		[Marchandises diverses]		A61	[II]		INTERDIT		INTERDIT	
(...)									[9XX]	[100 kg]	[9XX]	[200 kg]

PRESCRIPTIONS D'EMBALLAGE SUPPLÉMENTAIRES POUR LES EMBALLAGES UNIQUES

- Tous les sacs de quelque type que ce soit doivent être transportés dans des engins de transport fermés ou être placés dans des suremballages rigides fermés.
- Si le suremballage n'est pas étanche aux pulvérulents, il faut prévoir un moyen d'en retenir le contenu en cas de fuite, que ce soit une doublure étanche, un sac en plastique ou un autre moyen tout aussi efficace.

EMBALLAGES UNIQUES

<i>Caisses</i>	<i>Fûts</i>	<i>Jerricans</i>
Acier (4A)	Acier (1A2)	Acier (3A1, 3A2)
Aluminium (4B)	Aluminium (1B2)	Plastique (3H1, 3H2)
Autre métal (4N)	Carton (1G)	
Bois naturel (4C1, 4C2)	Contreplaqué (1D)	
Bois reconstitué (4F)	Plastique (1H2)	
Carton (4G)		
Contreplaqué (4D)		
Plastique (4H2)		

(...)

