



## DANGEROUS GOODS PANEL (DGP)

### TWENTY-EIGHTH MEETING

Virtual, 15 to 19 November 2021

#### Agenda Item 2: Managing air-specific safety risks and identifying anomalies

#### 2.2: Develop proposals, if necessary, for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air (Doc 9284)* for incorporation in the 2023-2024 Edition

#### SPECIAL PROVISION A36

(Presented by T. Muller)

#### SUMMARY

This working paper proposes to delete Special Provision A36 from UN 1228 and from UN 1963 and to simplify the text of Special Provision A36.

**Action by the DGP:** The DGP is invited to consider the amendments as proposed in the appendix to this working paper.

### 1. INTRODUCTION

1.1 DGP/28-WP/30 presented by Mr. Guo proposes a correction to UN 2881 — **Metal catalyst, dry** to remove the inconsistency with the assignment of Special Provision A36 to UN 2881. During the discussion of this working paper with some panel members, it became clear that the wording of Special Provision A36 is confusing.

1.2 Special Provision A36 applies to entries for which several packing groups exist and reads as follows:

The provisions of Special Provision A2 apply to this entry for Packing Group I only and the provisions of Special Provision A1 apply to this entry for Packing Group II only, as applicable.

This means that when Special Provision A36 is assigned to an entry, A1 and/or A2 should be assigned.

1.3 The UN numbers which have been assigned with Special Provision A36 are as follows:

Table 3-1. Dangerous Goods List

Name	UN No.	Class or division	Subsidiary hazard	Labels	State variations	Special provisions	UN packing group	Excepted quantity	Passenger and cargo aircraft		Cargo aircraft only	
									Packing instruction	Max. net quantity per package	Packing instruction	Max. net quantity per package
1	2	3	4		6	7	8	9	10	11	12	13

The amendment for UN 2881 shown below is proposed in DGP/28-WP/30

<b>Metal catalyst, dry*</b>	2881	4.2		Spontaneous Combustion		A1 A3 A36	II III	E0 E1	FORBIDDEN FORBIDDEN 473	25 kg	FORBIDDEN 473	50 kg 100 kg
<b>Tear gas substance, solid, n.o.s.*</b>	3448	6.1		Toxic	AU 1 CA 7 IR 3 NL 1 US 3	A1 A36	I II	E0 E0	FORBIDDEN FORBIDDEN		672 674	15 kg 25 kg
<b>Hydrazine, aqueous solution with more than 37% hydrazine by mass</b>	2030	8	6.1	Corrosive & Toxic	AU 1 CA 7 IR 3 NL 1 US 3	A1 A36	I II III	E0 E0 E1	FORBIDDEN FORBIDDEN 852 Y841	5 L 1 L	854 855 856	2.5 L 30 L 60 L
<b>Mercaptan mixture, liquid, flammable, toxic, n.o.s.*</b>	1228	3	6.1	Liquid flammable & toxic	AU 1 CA 7 IR 3 NL1 US 3	A1 A3 A36	II III	E0 E1	FORBIDDEN 373 Y373	5 L 1 L	373 373	60 L 220 L
<b>Mercaptans, liquid, flammable, toxic, n.o.s.*</b>	1228	3	6.1	Liquid flammable & toxic	AU 1 CA 7 IR 3 NL1 US 3	A1 A3 A36	II III	E0 E1	FORBIDDEN 373 Y373	5 L 1 L	373 373	60 L 220 L
<b>Tear gas substance, liquid, n.o.s.*</b>	1693	6.1		Toxic	AU 1 CA 7 IR 3 NL 1 US 3	A2 A36	II	E0	FORBIDDEN FORBIDDEN		FORBIDDEN 659	5 L

...

1.4  
be made:

From the list of entries assigned to Special Provision A36, the following conclusions can

- a) no entries that are assigned to Special Provision A36 are also assigned to both Special Provisions A1 and A2
- b) including the proposal in DGP/28-WP30, five entries are assigned to both Special Provisions A36 and A1: UN 2881, UN 3448, UN 2030 and UN 1228 (including the entry for mixtures); and

- c) one entry is assigned to Special Provision A36 and A2 only: UN 1693.

1.5 Based on the above, we believe that the following improvements and simplifications can be made to Part 3;2, Table 3-1 and to Part 3;3, Table 3-2:

- a) remove Special Provision A36 assigned to UN 1693

Reason: Special Provision A2 applies only to cargo aircraft only. For UN 1693, only Packing Group I is forbidden on cargo aircraft only. Therefore, Special Provision A36, which identifies that A2 applies only to Packing Group I, becomes redundant.

- b) remove Special Provision A36 assigned to UN 1228

Reason: UN 1228 only has Packing Group II and Packing Group III. Moreover, only Packing Group II of UN 1228 is forbidden on passenger aircraft which means that there is no need to identify by means of Special Provision A36 that A1 applies only to Packing Group II.

- c) amend Special Provision A36 as follows:

“A36 The provisions of Special Provision A1 apply to this entry for Packing Group II only. “

Reason: The following remaining UN numbers, UN 2881, UN 3448 and UN 2030 only have Special Provision A1 assigned which makes the reference to A2 for Packing Group I redundant.

By removing Special Provision A36 from UN 1693 and from UN 1228 and by modifying the text of Special Provision A36, the intent of Special Provision A36 will be better understood.

## 2. ACTION BY THE DGP

2.1 The DGP is invited to consider the amendments as proposed 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

...

Chapter 2

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

...

Table 3-1. Dangerous Goods List

Name	UN No.	Class or division	Subsidiary hazard	Labels	State variations	Special provisions	UN packing group	Excepted quantity	Passenger and cargo aircraft		Cargo aircraft only	
									Packing instruction	Max. net quantity per package	Packing instruction	Max. net quantity per package
1	2	3	4		6	7	8	9	10	11	12	13

The amendment for UN 2881 shown below is proposed in DGP/28-WP/30

<b>Metal catalyst, dry*</b>	2881	4.2		Spontaneous Combustion		<del>A1</del> A3 A36	II III	E0 E1	FORBIDDEN FORBIDDEN 473	25 kg	FORBIDDEN 473	50 kg 100 kg
<b>Mercaptan mixture, liquid, flammable, toxic, n.o.s.*</b>	1228	3	6.1	Liquid flammable & toxic	AU 1 CA 7 IR 3 NL1 US 3	A1 A3 <del>A36</del>	II III	E0 E1	FORBIDDEN 373 Y373	5 L 1 L	373 373	60 L 220 L
<b>Mercaptans, liquid, flammable, toxic, n.o.s.*</b>	1228	3	6.1	Liquid flammable & toxic	AU 1 CA 7 IR 3 NL1 US 3	A1 A3 <del>A36</del>	II III	E0 E1	FORBIDDEN 373 Y373	5 L 1 L	373 373	60 L 220 L
<b>Tear gas substance, liquid, n.o.s.*</b>	1693	6.1		Toxic	AU 1 CA 7 IR 3 NL 1 US 3	A2 <del>A36</del>	II	E0	FORBIDDEN FORBIDDEN		FORBIDDEN 659	5 L

...

### Chapter 3

## SPECIAL PROVISIONS

...

Table 3-2. Special provisions

<i>TIs</i>	<i>UN</i>
...	
A36	<del>The provisions of Special Provision A2 apply to this entry for Packing Group I only and t</del> The provisions of Special Provision A1 apply to this entry for Packing Group II only, as applicable.
...	

— END —