



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/19)**

Montréal, 1 to 5 April 2019

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 2021-2022 Edition

REVISION TO PACKING INSTRUCTION 650

(Presented by M. Paquette)

SUMMARY

This working paper proposes to revise Packing Instruction 650 paragraph 13) to clarify the intention with regards to meeting the requirements of Part 3;5.

Action by the DGP-WG: The DGP-WG is invited to consider the proposed amendment to Packing Instruction 650 paragraph 13) as shown in the Appendix to this working paper.

1. INTRODUCTION

1.1 Packing Instruction 650 of the Technical Instructions and Packing Instruction P650 the *UN Model Regulations* both permit up to 30ml of Class 3, 8 or 9 dangerous goods to be packed in the primary receptacle containing the infectious substance for the purpose of maintaining the viability, stabilising or preventing the degradation or neutralising the hazards of the infectious substances.

1.2 Prior to the 2007-2008 edition of the Technical Instructions, both packing instructions had identical provisions in paragraph 13).

1.3 Packing Instruction 650 paragraph 13) was revised by the twentieth meeting of the Dangerous Goods Panel after inconsistencies were identified between the provisions for dangerous goods of Classes 3, 8 or 9 when packed with infectious substances and those permitted under the excepted quantities provisions. These included the possibility to exceed the quantity limits for excepted quantities when shipping multiple primary receptacles and the authorization to permit both Class 8 packing group I

substances and substances normally forbidden on passenger aircraft. Packing Instruction 650 paragraph 13) was modified as follows:

- 13) Other dangerous goods must not be packed in the same packaging as Division 6.2 infectious substances unless they are necessary for maintaining the viability, stabilizing or preventing degradation or neutralizing the hazards of the infectious substances. A quantity of 30 ml or less of dangerous goods included in Class 3, 8 or 9 may be packed in each primary receptacle containing infectious substances provided these substances meet the requirements of 1;2.4.2 and 1;2.4.3. When these small quantities of dangerous goods are packed with infectious substances in accordance with this packing instruction no other requirements in these Instructions need be met.

1.4 Part 1;2.4.2 pertained to “Applicability” (classes and divisions of dangerous goods permitted as excepted quantity) and Part 1;2.4.3 addressed “Quantity limits” for inner and outer packagings.

1.5 Packing Instruction 650 paragraph 13) was again revised by the twenty-first meeting of the Dangerous Goods Panel following the incorporation in the *UN Model Regulations* of a new chapter on excepted quantities and a new column for limited quantities in the List of Dangerous Goods. The Dangerous Goods Panel had determined that the requirements in the new chapter largely reflected those in 1;2.4 of the 2007-2008 Edition of the Technical Instructions with the exception of a new excepted quantities mark and a new format in which a code is assigned to each entry in the List of Dangerous Goods with the corresponding quantity limits presented in a table the new chapter.

1.6 With the creation of a new chapter for excepted quantities, the reference in Packing Instruction 650 13) was changed from 1;2.4.2 and 1;2.4.3 to Part 3;5 in the 2009-2010 Edition of the Technical Instructions.

1.7 By requiring that all provisions of Part 3;5 be met, it infers that Packing Instruction 650 packages are subject to two separate regimes under the Technical Instructions the infectious substances packaging regime and the excepted quantities regime. The excepted quantities regime includes additional requirements, such as subjecting packages to a more stringent drop test of 1.8 m, marking the packages with the excepted quantities mark, prohibiting the consignment in the post and requiring the shipper to be trained in accordance with Part 1;4.

1.8 We believe that the original intent for including Part 3;5 in Packing Instruction 650 was to permit only those dangerous goods included in Class 3, 8 or 9 that have E1, E2 or E3 assigned to them in Column 9 of Table 3-1 and not to include the additional and in certain cases, more stringent requirements of the excepted quantities regime.

2. ACTION BY THE DGP-WG

2.1 The DGP is invited to consider the proposed amendment to Packing Instruction 650 paragraph 13) as shown in the Appendix to this working paper.

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APPENDIX

PROPOSED AMENDMENT TO PART 4 OF THE TECHNICAL INSTRUCTIONS

Part 4

PACKING INSTRUCTIONS

Chapter 8

CLASS 6 — TOXIC AND INFECTIOUS SUBSTANCES

8.1 PACKING INSTRUCTIONS

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Packing Instruction 650

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- 13) Other dangerous goods must not be packed in the same packaging as Division 6.2 infectious substances unless they are necessary for maintaining the viability, stabilizing or preventing degradation or neutralizing the hazards of the infectious substances. A quantity of 30 ml or less of dangerous goods included in Class 3, 8 or 9 permitted as excepted quantities under 3.5 may be packed in each primary receptacle containing infectious substances ~~provided these substances meet the requirements of 3.5~~. When these small quantities of dangerous goods are packed with infectious substances in accordance with this packing instruction no other requirements in these Instructions need be met.

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