



**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals****Sub-Committee of Experts on the Transport of Dangerous Goods****Fifty-sixth session**

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Item 3 of the provisional agenda

Listing, classification and packing**Considerations on dangerous goods permitted in UN 3363****Transmitted by the International Air Transport Association (IATA)*****Introduction**

1. Recently IATA was approached by a member airline that was seeking confirmation on the classification of an article that was offered for air transport as UN 3363, DANGEROUS GOODS IN APPARATUS. The article, a clock, contains a small sealed capsule within which is a mixture of gases, including UN 1037, ETHYL CHLORIDE.
2. While UN 1037 is not permitted as limited quantity, the sealed capsule containing Division 2.1 gas is classified as UN 2037, GAS CARTRIDGE, which can be shipped as a limited quantity. Based on the wording of special provision 301, the shipper determined that the clock could be classified as UN 3363. The wording of special provision 301 reads as follows:

“301 This entry only applies to articles such as machinery, apparatus or devices containing dangerous goods as a residue or an integral element of the articles. It shall not be used for articles for which a proper shipping name already exists in the Dangerous Goods List of Chapter 3.2. Articles transported under this entry shall only contain dangerous goods which are authorized to be transported in accordance with the provisions of Chapter 3.4 (Limited quantities). The quantity of dangerous goods in articles shall not exceed the quantity specified in Column 7a of the Dangerous Goods List of Chapter 3.2 for each item of dangerous goods contained. If the articles contain more than one item of dangerous goods, the individual dangerous goods shall be

* In accordance with the programme of work of the Sub-Committee for 2019–2020 approved by the Committee at its ninth session (see ST/SG/AC.10/C.3/108, paragraph 141 and ST/SG/AC.10/46, paragraph 14).

enclosed to prevent them reacting dangerously with one another during transport (see 4.1.1.6). When it is required to ensure liquid dangerous goods remain in their intended orientation, orientation arrows shall be displayed on at least two opposite vertical sides with the arrows pointing in the correct direction in accordance with 5.2.1.7.1.

The competent authority may exempt from regulation machinery or apparatus which would otherwise be transported under this entry.”

3. There is nothing stated special provision 301 that limits the dangerous goods that may be in articles, other than that they “...shall only contain dangerous goods which are authorized to be transported in accordance with the provisions of Chapter 3.4 (Limited quantities).”

4. UN 3363 is assigned to packing instruction P907. While the wording of P907 implies that only gases in Division 2.2 are permitted by reference to requirements for Division 2.2 gases as follows: “For Division 2.2 gases, the inner cylinder or receptacle, its contents and filling density shall be to the satisfaction of the competent authority of the country in which the cylinder or receptacle is filled.”. Again there is no explicit statement that gases in Division 2.1 are not permitted.

5. In developing this working paper, it was also identified that there is nothing stated in either special provision 301 or packing instruction P907 that would prohibit an article containing UN numbers 0012, 0014 or 0055 from being classified as UN 3363 as these UN numbers are also permitted to be shipped as limited quantity. However, given the explicit prohibition for explosives in articles containing dangerous goods, n.o.s. as stated in 2.0.5.4, it is believed that the Subcommittee does not intend for articles classified as UN 3363 to be able to contain explosives.

Proposal

6. There are no formal proposals in this document. Rather the Subcommittee is invited to consider whether there should be some provision for an article classified as UN 3363 to contain a small quantity of flammable gas.

7. The Subcommittee is also invited to consider if special provision 301 should be revised to specifically exclude the three Class 1 UN numbers from being permitted in articles classified as UN 3363. Some possible wording is shown below (new text shown in bold underlined):

“301 This entry only applies to articles such as machinery, apparatus or devices containing dangerous goods as a residue or an integral element of the articles. It shall not be used for articles for which a proper shipping name already exists in the Dangerous Goods List of Chapter 3.2. Articles transported under this entry shall only contain dangerous goods which are authorized to be transported in accordance with the provisions of Chapter 3.4 (Limited quantities). **This does not apply to UN numbers 0012, 0014 and 0055.** The quantity of dangerous goods in articles shall not exceed the quantity specified in Column 7a of the Dangerous Goods List of Chapter 3.2 for each item of dangerous goods contained. If the articles contain more than one item of dangerous goods, the individual dangerous goods shall be enclosed to prevent them reacting dangerously with one another during transport (see 4.1.1.6). When it is required to ensure liquid dangerous goods remain in their intended orientation, orientation arrows shall be displayed on at least two opposite vertical sides with the arrows pointing in the correct direction in accordance with 5.2.1.7.1.

The competent authority may exempt from regulation machinery or apparatus which would otherwise be transported under this entry.”