



WORKING PAPER

DANGEROUS GOODS PANEL (DGP)

TWENTY-SIXTH MEETING

Montréal, 16 to 27 October 2017

Agenda Item 3: Development of recommendations for amendments to the *Supplement to the Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284SU) for incorporation in the 2019-2020 Edition

PACKING INSTRUCTION NUMBER FOR DANGEROUS GOODS CARRIED UNDER APPROVAL OR EXEMPTION

(Presented by D. Brennan)

SUMMARY

This working paper proposes that there be some additional text added to Part S-1, Chapter 1, Attachment I of the Supplement to provide guidance to States on what packing instruction number must be shown on the dangerous goods transport document for dangerous goods being shipped under an approval or exemption.

It is also proposed that there should be some additional guidance on the need for States to coordinate with the operator prior to issuing an approval or exemption to a shipper.

Action by the DGP: The DGP is invited to consider revising the text in Part S-1, Chapter 1, Attachment I of the Supplement — Considerations for Exemptions and Approvals as shown in the appendix to this working paper.

1. INTRODUCTION

1.1 The Technical Instructions permit certain dangerous goods normally forbidden on a cargo aircraft and/or passenger aircraft to be shipped under an approval, where this is specifically provided for in the Technical Instructions, and also for dangerous goods to be shipped under an exemption, as provided for in Part 1;1.1.3.

1.2 The Supplement in Part S-1;2 and S-1;3 then provides general information and recommendations to States that should be considered when processing and issuing exemptions. Further guidance to States for processing exemptions and approvals is then set out in Attachment I to Chapter 1.

1.3 What is not specifically addressed in either Part S-1;2, S-1;3 or Attachment I is any guidance or recommendations to States on reference to packing instructions and how packing instructions that exist only in the Supplement should be considered or addressed when issuing an approval or exemption.

1.4 The issue here is that the operator is required to perform an acceptance check for dangerous goods offered on a dangerous goods transport document even where the dangerous goods are being carried under an approval or exemption. For some dangerous goods the packing instruction number may be one that only appears in the Supplement and not in the Technical Instructions.

1.5 Under this circumstance it is assumed that the approval or exemption should make reference to the use of the packing instruction number shown in the Supplement, and the shipper will be directed to show on the dangerous goods transport document that packing instruction number. For example UN 1005 — **Ammonia, anhydrous** shipped under Special Provision A2. The packing instruction shown in the Supplement for UN 1005 is Packing Instruction 210. However, Packing Instruction 210 is not shown in the Technical Instructions.

1.6 To correctly perform the acceptance check the operator is required to verify that the packaging for the dangerous goods is permitted by the applicable packing instruction. However, without the packing instruction the operator is unable to correctly complete this step in the acceptance check.

1.7 It is suggested that as a start that there should be guidance included in the Supplement that indicates that the approval or exemption document should require the shipper to apply the packing instruction number in the Supplement when one is provided and where the packing instruction does not exist in the Technical Instructions that a copy of this packing instruction is provided with the approval or exemption for the operator to verify against for the acceptance check.

2. ACTION BY THE DGP

2.1 The DGP is invited to revise Part S-1, Chapter 1, Attachment I, B – Considerations for Exemptions and Approvals in the Supplement as shown in the appendix to this working paper.

APPENDIX

**PROPOSED AMENDMENT TO PART 1 OF THE SUPPLEMENT TO THE TECHNICAL
INSTRUCTIONS**

Part S-1

GENERAL

**(ADDITIONAL INFORMATION
FOR PART 1 OF THE
TECHNICAL INSTRUCTIONS)**

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Chapter 1

SCOPE AND APPLICABILITY

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ATTACHMENT I TO CHAPTER 1

**GUIDANCE FOR PROCESSING EXEMPTIONS AND APPROVALS FOR THE
SAFE TRANSPORT OF DANGEROUS GOODS BY AIR**

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B. CONSIDERATIONS FOR EXEMPTIONS AND APPROVALS

It is recognized that competent authorities may have varying formats for issuing exemptions and approvals. The following information is suggested for consideration by States when issuing such documents:

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- The conditions of transport, for example, authorized packaging, quantities, and any additional hazard communication elements that may apply.
- The packing instruction number that is to be shown on the dangerous goods transport document by the shipper. Where the packing instruction is one that is only contained in this Supplement and not in the Technical Instructions, consideration should be given to including the entire packing instruction in the exemption or approval so that the operator can utilize this in their acceptance check.
- Any special conditions that may apply such as whether persons other than the grantee may re-offer the dangerous goods for subsequent transportation.
- Any limitations that may apply, for example, whether the approval is limited to a single instance, to a specific operator, or any other limitations.

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