



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
MEETING OF THE WORKING GROUP OF THE WHOLE**

The Hague, 3 to 7 November 2008

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2011/2012 Edition

2.3: Part 3 — Dangerous Goods List, Special Provisions and Limited and Excepted Quantities

LIMITED QUANTITIES AND CONSUMER COMMODITIES

(Presented by R. Richard)

SUMMARY

This paper seeks to invite discussion on potential options to address the transport of dangerous goods in limited quantities and as consumer commodities. Taking into account recent decisions of the UN Sub-Committee of Experts on the Transport of Dangerous Goods, the paper proposes a number of options for consideration by the DGP-WG.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 Over the last several years, the issue of limited quantities has been considered at various times by the panel. At its July 2008 session, the UN Sub-Committee of Experts on the Transport of Dangerous Goods (TDG) adopted a standard marking for packages containing limited quantities. The Sub-Committee recognized during the discussions surrounding this issue that the DGP would consider the issue separately and expressed an interest in ensuring that the language adopted within the UN Model Regulations took into account the anticipated actions of the DGP in relation to the marking. A number of panel members participated in the discussions, and provisions for bridging the gaps between the air mode and other modes of transport were discussed. As such, the panel is invited to consider whether amendments to the Technical Instructions can be implemented to maintain an appropriate level of safety while enhancing multimodal harmonization.

1.2 There are significant differences between a limited quantity package prepared in accordance with the Technical Instructions and one prepared in accordance with the requirements of other modes. In particular, limited quantities prepared in accordance with the Technical Instructions are required to bear hazard labels and the inner packaging quantities are much less than those permitted in other modes of transport. The only exception truly equivalent to the limited quantity exceptions recognized by other modes is that packages are not required to be tested and marked in accordance with

Part 6, Chapter 4, although according to 3;4.4 they must be capable of passing a 1.2 meter drop test and a 24 hour stacking test. Further, packagings containing liquids must also be capable of withstanding pressure differential changes.

1.3 The purpose of this paper is to propose some options for consideration by the panel to enhance harmonization while maintaining an appropriate level of safety. It would be helpful if the panel was able to take some decisions in principle during the first working group meeting in order to provide timely feedback to the UN Sub-Committee for its consideration during its December session, which is the final session during which amendments to the Fifteenth Revised Edition of the UN Model Regulations will be considered.

1.4 In addition to proposing options relevant to limited quantities, this paper suggests the panel consider the current requirements for consumer commodities (ID 8000). In light of the fact that the UN Sub-Committee is considering eliminating the distinction in the UN Model Regulations between limited quantities and consumer commodities, the panel should consider what changes, if any, are appropriate to the Technical Instructions. Consumer commodities are transported in significant quantities on both passenger and cargo aircraft; it is therefore suggested that the panel take a cautious and well thought out approach that takes into account all perspectives to ensure an appropriate level of safety is afforded for air transport.

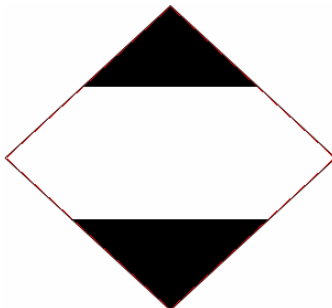
2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to consider the following proposal to address limited quantities and to discuss options for addressing consumer commodities:

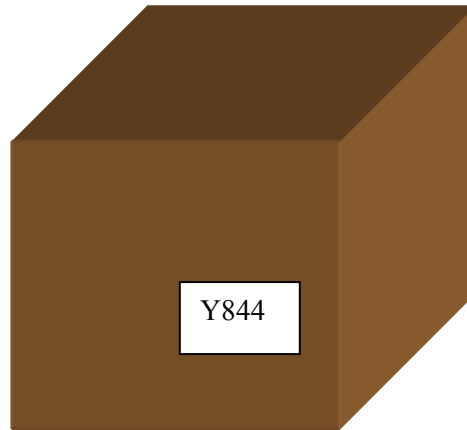
Limited Quantities

2.2 Proposal: Remove the term “limited quantities” from the Technical Instructions altogether, while maintaining the existing specification packaging exception for those substances currently authorized to be transported as limited quantities by air. If this proposal is agreed to, it may be necessary to address the appropriate identification of non-UN specification packaging. This indication could replace the current “limited quantities” text marking required by 3;4.5.2. All other current provisions of the Technical Instructions would continue to apply (i.e. UN number, hazard labels, etc). This proposal could be approached as provided below:

- a) Consider allowing the marking agreed to by the UN Sub-Committee for shipments originating in other modes to be transported by air. The standard marking being considered by the UN Sub- Committee is as follows:



- b) Develop a new marking to indicate that the package is not required to be marked with a UN specification packaging marking for transportation of current materials classified as limited quantities by air. This could be done by marking the “Y” packing instruction number or some other text that clearly identifies that the specification packaging exception is authorized. The panel is invited to explore other options as well.



Consumer Commodities

2.3 The panel is invited to consider ways forward to address consumer commodities through an open dialogue in which an objective exchange of ideas can be discussed and shared. One possibility may be to create a unique air specific marking to identify consumer commodity packages. Alternatively, the panel may wish to consider simply maintaining the current marking and labelling requirements which apply based on their designation as Class 9 materials. It is recognized that the current system for consumer commodities provides an adequate level of safety for the transport of consumer commodities and that introducing a new marking scheme may not be justifiable considering the challenges associated with remarking packages and training personnel. In considering the possibility of a new marking, the panel should consider if a marking that includes the new UN standard mark as shown below is sufficiently distinctive from the mark's use in other modes in order to communicate that the additional requirements related to aviation safety of the Technical Instructions have been met. The panel is also invited to consider other alternatives to enhance safety and potentially enhance compliance.

