



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

2.4: Part 4 — Packing Instructions

MARKING / LABELLING REQUIREMENTS FOR DRY ICE IN ULD

(Presented by D. Brennan)

SUMMARY

This paper proposes a minor amendment to Packing Instruction 904 clarifying that shipper prepared ULDs with dry ice as a refrigerant for non-dangerous goods are not subject to the marking and labelling requirements of Part 5.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 The provisions of Packing Instruction 904 were modified with effect the 2007-2008 edition of the Technical Instructions to address the requirements when a shipper offers a carrier dry ice as a refrigerant for other than dangerous goods in a unit load device.

1.2 Several shipments containing dry ice prepared in this way were rejected, as the unit load device did not show the required (package) marks and labels. It is believed that it is not the intent of the Instructions to require such marking and labelling.

1.3 This proposal seeks to clarify that, provided the unit load device is placarded by the operator in accordance with identification of unit load devices provisions of Part 7;2.7.1, that the unit load device need not be marked with the UN number or proper shipping name, and need not be labelled with a Class 9 miscellaneous label.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to amend Packing Instruction 904 as shown:

904	PACKING INSTRUCTION 904	904
. . .		
<p>Dry ice used as a refrigerant for other than dangerous goods may be shipped in a unit load device or other type of pallet prepared by a single shipper provided that the shipper has made prior arrangements with the operator. In such case, the unit load device, or other type of pallet must allow the venting of the carbon dioxide gas to prevent a dangerous build-up of pressure. <u>Also in such case, the marking requirements of Part 5;2 and the labelling requirements of Part 5;3 do not apply to the unit load device.</u> The shipper must provide the operator with written documentation stating the total quantity of the dry ice contained in the unit load device or other type of pallet.</p> <p>Note.— For loading restrictions see 7;2.11; for special marking requirement see 5;2.4.7.</p>		

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