



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/24)**

Montreal, 21 to 25 October 2024

Agenda Item 3: Facilitating safe transport of dangerous goods by air (Ref: REC-A-DGS-2027)

**NEW REQUIREMENT FOR COMBINATION PACKAGINGS HAVING INNER PACKAGING
CONTAINING LIQUID DANGEROUS GOODS**

(Presented by D. Sylvestre)

SUMMARY

With the aim of minimizing delay in the supply chain, when combination packagings have inner packagings that contain liquid dangerous goods and do not have “package orientation” labels, as per 4;1.1.13, this paper would like to propose the addition of a new requirement which would indicate to the cargo acceptance staff and inspection staff, using the dangerous goods transport document, that the exemption is used intentionally.

Action by the DGP-WG: Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 To reduce delays in the supply chain, the Technical Instructions outline specific requirements related to labelling of packagings. However, exemptions are available and can be utilized by shippers when preparing consignments. For example, the exemption under section 4;1.1.13 allows for combination packagings containing liquid dangerous goods to be exempt from package orientation labels.

1.1.13.1 Orientation arrows are not required on outer packagings containing:

- a) dangerous goods in inner packagings each containing not more than 120 mL with sufficient absorbent material between the inner and outer packagings to completely absorb the liquid contents;
- b) Division 6.2 infectious substances in primary receptacles each containing not more than 50 mL; or
- c) dangerous goods in gas tight inner packagings such as tubes, bags or vials which are opened by breaking or puncturing. Each inner packaging must not contain more than 500 mL.

1.2 Although this exemption is rarely used, cargo facility staff may contact the shipper for verification if they encounter a consignment lacking “package orientation” labels. This is because the “dangerous goods transport document” does not include details on the volume contained in the inner packaging. These consignments may also draw the attention of trained staff, flight crews, or State

inspectors, potentially causing delays due to the need for an inspection, which may include opening the package.



Figure 1. Consignment having inner packagings containing liquid dangerous goods, without “package orientation” labels

Dangerous Goods Identification						
UN or ID No.	Proper Shipping Name	Class or Division (subsidiary hazard)	Packing Group	Quantity and Type of Packing	Packing Inst.	Authorization
UN1133	Adhesives	3	III	1 fiberboard box x 7.2 L	Y344	
UN1133	Adhesives	3	III	1 fiberboard box x 3.3 L	Y344	

Figure 2. Extract of shipping document for a consignment having inner packagings containing liquid dangerous goods, without “package orientation” labels

1.3 We explored the possibility of a new special provision but decided otherwise as it would apply for half the present UN numbers in Table 3-1. In addition, while exempted, most shippers will add “orientation arrows” to their packages. We therefore decided to propose the addition of a text when this exemption is used.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to consider amending Part 4;1.1.13 of the Technical Instructions to require a statement on the dangerous goods transport document when a shipper has applied the

exception from the package orientation arrows provided in 4; 1.1.13.1, as shown in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENT TO PART 4 OF THE TECHNICAL INSTRUCTIONS

Part 4

PACKING INSTRUCTIONS

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Chapter 1

GENERAL PACKING REQUIREMENTS

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1.1.13 Except as provided in 1.1.13.1, combination packagings having inner packagings containing liquid dangerous goods must be packed so that the closures on the inner packagings are upward and the upright position of the package must be indicated on it by the "Package orientation" label described in 5;3.2.12 b). The words "This side up" or "This end up" may also be displayed on the top cover of the package.

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- b) Division 6.2 infectious substances in primary receptacles each containing not more than 50 mL; or
- c) dangerous goods in gas tight inner packagings such as tubes, bags or vials which are opened by breaking or puncturing. Each inner packaging must not contain more than 500 mL.

1.1.13.2 The shipper must indicate on the dangerous goods transport document that the packages are using this provision with the following statement: "For UN...., orientation arrows are not required in accordance with 4;1.1.13.1."

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