



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/25)**

Delhi, India, 21 to 25 April 2025

- Agenda Item 2: Managing air-specific safety risks and identifying anomalies (REC-A-DGS-2027)**
2.2: Develop proposals, if necessary, for amendments to the Technical Instructions for the *Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2027-2028 Edition

INADVERTENT OMISSION OF REQUIREMENTS APPLICABLE TO UNPACKAGED ARTICLES

(Presented by the Dangerous Goods Advisory Council (DGAC))

SUMMARY

This working paper is presented to highlight an apparent omission in Technical Instructions in respect of unpackaged articles.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 The Technical Instructions contain a number of items of dangerous goods which may be transported unpackaged. It has been noted that a number of provisions of the Technical Instructions apply only to packages and overpacks but which should apply irrespective of whether the dangerous goods are in packaging. For example:

Part 5;1.1:

“Before a person offers any package or overpack of dangerous goods for transport by air, that person must ensure that...” (the shipper’s responsibilities have been met);

Part 7;1.2 (acceptance of dangerous goods by operators):

“An operator must not accept for transport aboard an aircraft a package or overpack containing dangerous goods...”

Part 7;1.3 (the acceptance check):

“Before a consignment consisting of a package or overpack containing dangerous goods... the operator must, by use of a checklist, verify the following:” (compliance)

Consequently, as written, items such as vehicles and lithium batteries contained in equipment which are not required to be in a package as the equipment affords equivalent protection are not, for example, subject to the acceptance requirements of the Technical Instructions. It is believed there may be many other similar references in the Technical Instructions.

2. ACTION BY THE DGP-WG

2.1 No proposal is made at this time, but it is suggested work is required to determine those areas of the Technical Instructions where unpackaged articles have been inadvertently excluded from provisions of the Technical Instructions, and appropriate text developed to resolve the situation. It may be as simple as making the amendments shown in the appendix to this working paper.

APPENDIX

POTENTIAL WAY TO ADDRESS GAPS CAUSED BY THE OMISSION OF REQUIREMENTS APPLICABLE TO UNPACAKAGED ARTICLES IN THE TECHNICAL INSTRUCTIONS

Editorial Note.— It is stressed that the following amendments are examples and are only those which are immediately apparent, there may be many more.

PART 5

SHIPPER'S RESPONSIBILITIES

CHAPTER 1

GENERAL

...

1.1 GENERAL REQUIREMENTS

Before a person offers ~~any package or overpack~~ of dangerous goods for transport by air, that person must ensure that:

...

PART 7

OPERATOR'S RESPONSIBILITIES

...

Chapter 1

ACCEPTANCE PROCEDURES

...

1.2 ACCEPTANCE OF DANGEROUS GOODS BY OPERATORS

1.2.1 An operator must not accept for transport aboard an aircraft ~~a package or overpack containing~~ dangerous goods or a freight container containing radioactive material or a unit load device containing the dangerous goods as described in 1.4.1 b) and c) unless:

...

1.3 THE ACCEPTANCE CHECK

1.3.1 Before a consignment consisting of ~~a package or overpack containing~~ dangerous goods, a freight container containing radioactive material or a unit load device containing dangerous goods as described in 1.4 is first accepted for carriage by air, the operator must, by use of a checklist, verify the following:

— END —