DANGEROUS GOODS PANEL

Dubai, 31 March to 4 April 2003

Agenda Item 2 : Development of recommendations for amendments to the Technical Instructions for incorporation in the 2005/2006 edition

CLARIFICATIONS TO: PACKING INSTRUCTION 904 LIMITED QUANTITY MARKING 5;2.4.10 AND 3;4.5.2 ID NUMBERS 3.2.1.1

(Presented by R. Richard)

1. INTRODUCTION

1.1 This paper includes a several editorial amendments that are considered necessary to enhance compliance with the Technical Instructions. The proposed amendments are based on inquiries received from consignors and carriers.

1.2 Packing Instruction 904

1.2.1 Packing instruction 904 provides exceptions for the transport of dry ice. An exception from the dangerous goods transport document requirements is authorized provided alternative documentation is supplied containing the information required by 5;4.1, excluding the packing instruction number and packing group. It would be much clearer and more straightforward to indicate exactly what is required. We have received questions relevant to whether the following elements of information are required:

- Declaration statement and signature (5;4.1.6);
- Statement that the shipment is within the limitations prescribed for either passenger aircraft or cargo-only aircraft as appropriate (5;4.1.5.8b note: the same quantity applies for both passenger and cargo aircraft in the DGL); and

· The name and address of the shipper and consignee of the carbon dioxide, dry.

1.2.2 If the intent is that the shipper be relieved from these transport document requirements then PI 904 should be clarified as follows:

Proposal

Change Packing Instruction 904, third sentence to read:

The dangerous goods transport document requirements of Part 5, Chapter 4 are not applicable provided alternative documentation is supplied containing the ~~information required by 5;4.1, excluding the packing instruction number and packing group.~~ proper shipping name (Carbon dioxide, solid), the UN number (UN 1845), hazard class (9) and the quantity and type of packaging.

The working group should also consider whether the fourth sentence in P904 is necessary.

[The information must be included with the description of the goods.]

1.3 **Limited quantity marking requirements**

1.3.1 Paragraphs 5;2.4.10 and 3;4.5.2 indicate that packages of dangerous goods in limited quantities must be marked to indicate that they contain "limited quantities". The use of quotation marks insinuates that the only correct marking would be "limited quantities" as opposed to "LTD QTY" as is often used. Since the Technical Instructions allows the "LTD QTY" abbreviation to be used on the transport document (3;4.6, 5;4.1.5.2), this alternative should be added to 5;2.4.10 and 3;4.5.2 for marking.

1.3.2 **Proposal**:

In 3;4.5.2 and 5;2.4.10 the words or "LTD QTY" should be added as follows:

3;4.5.2 Packages containing limited quantities of dangerous goods must be marked to indicate that they contain "limited quantities" or "LTD QTY" in addition to the markings required by 4.5.1.

5;2.4.10 Packages containing limited quantities of dangerous goods must be marked to indicate that they contain "limited quantities" or "LTD QTY". See 3;4.5.2.

1.4 **ID Numbers**

1.4.1 In 3;2.1.1 when explaining Column 2 of the Dangerous Goods Table: "...a temporary identification number (ID) in the 8000 series has been allocated and is indicated where appropriate." However, nowhere else in the Technical Instructions is the "ID" prefix indicated or otherwise mentioned. 5;2.4.1.1 and 5;4.1.4.1(a) direct the user to use the prefix "UN" for all UN numbers when marking packages and completing transport documents. The list of UN numbers in Appendix 1 also does not mention the existence of an "ID" prefix.

1.4.2 **Proposal**

In paragraph 3;2.1.1 add: Numbers in the 8000 series will always use the "ID" prefix even when "UN" is indicated in the requirements for marking and documentation in these Technical Instructions.

Alternatively we could add the reference to “ID” number into 5;2.4.1.1 and 5;4.1.4.1(a).

1.5 **Alternative basic description sequence information**

1.5.1 The alternative basic description sequence information provided in 5;4.1.4.2.2 makes the preceding paragraph (5;4.1.4.2.1) redundant. The UN Model Regulation does not contain a comparable 5;4.1.4.2.1.

1.5.2 **Proposal**

Delete paragraph 5;4.1.4.2.1. In 5;4.1.4.2.2 change the words An example to Examples and include the example that is currently in 5;4.1.4.2.1 so that an example of each sequence is shown.

— END —