International Civil Aviation Organization

WORKING PAPER

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DANGEROUS GOODS PANEL (DGP)

MEETING OF THE WORKING GROUP OF THE WHOLE

Montreal, 18 to 22 April 2005

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions* for incorporation in the 2007/2008 edition
2.4: Part 4 — Packing Instructions
2.6: Part 6 — Packaging Nomenclature, Marking, Requirements and Tests

"W" PACKAGINGS

(Presented by G A Leach)

1. BACKGROUND

1.1 The Technical Instructions contain a significant variation to the UN Recommendations in relation to "W" marked packagings involving extra paperwork for no apparent safety benefit. Part 6; 1.2.7 requires that use of a "W" marked packaging may only be with the written approval of the State of Origin. It is not clear what benefit this provides. A "W" marked packaging is NOT exempt from testing, it simply does not meet the precise constructional provisions set down in the Technical Instructions. It is not normal practice in any mode of transport to carry packaging authorisations, the mark on the package provides traceability back to the approval organisation and often the manufacturer.

1.2 Packaging technology has changed over the 30 years since the text first appeared and new methods of distribution of goods means industry need flexibility to deviate from the precise definitions and the "W" mark provides this flexibility. There are a significant number of "W" marked packagings in circulation this additional piece of paper does no more than confirm there is an approval document

1.3 An incident recently occurred where an agent was unable to forward a consignment of dangerous goods to an operator for carriage by air because the goods were packed in a "W" marked package and the UK CAA had not been requested to grant a State of Origin approval which in any event would have been inappropriate because the "W" mark had not been assigned by the UK authorities.

1.4 The relevant differences in text are highlighted as follows:

Technical Instructions Part 6	**UN Recommendations 13th Edition**
1.2.7 "…The letter "W" signifies that the packaging, although of the same type indicated by the code, is manufactured to a specification different to that in 3.1. The transport of such a packaging by air is subject to the written approval of the State of Origin."	6.1.2.4 "… The letter "W" signifies that the packaging, although of the same type indicated by the code, is manufactured to a specification different from that in 6.1.4 and is considered equivalent under the requirements of 6.1.1.2.

Technical Instructions Part 4	**UN Recommendations 13th Edition**
"2.4 Where the packing instructions … followed by the letter "V" marked in accordance with the requirements of 6;4.1.7 h) (e.g. 4GV, 1A2V) may also be used …."	"4.1.3.5 Where the packing instructions … followed by the letters "V", "U" or "W" marked in accordance with the requirements of Part 6 (e.g. 4GV, 4GU or 4GW; 1A2V, 1A2U or 1A2W) may also be used …"

Proposal 1

Amend Part 6; 1.2.7 as follows:

1.2.7 "…The letter "W" signifies that the packaging, although of the same type indicated by the code, is manufactured to a specification different to that in 3.1 and is considered equivalent under the requirements of 1.1.2. ~~The transport of such a packaging by air is subject to the written approval of the State of Origin.~~"

Proposal 2

Amend Part 4; 2.4 as follows:

"Where the packing instructions … followed by the letters "V", "U" or "W" marked in accordance with the requirements of Part 6 (e.g. 4GV, 4GU or 4GW; 1A2V, 1A2U or 1A2W) may also be used …"

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