DANGEROUS GOODS PANEL (DGP)

MEETING OF THE WORKING GROUP OF THE WHOLE

Abu Dhabi, 4 to 8 October 2004

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions* for incorporation in the 2007/2008 edition
2.1: Part 1 — General

DEFINITION OF AN OVERPACK

(Presented by P. Steele)

1. INTRODUCTION

1.1 In Part 1; 3.1.1 of the Technical Instructions an Overpack is defined as: "An enclosure used by a single shipper to contain one or more packages and to form one handling unit for convenience of handling and stowage." The Instructions exclude a unit load device (ULD) from this definition. The 13th Edition of the UN Model Regulations has a similar definition for an overpack using the term "single consignor" rather than shipper.

1.2 There are many agencies that consolidate consignments of dangerous and non-dangerous goods from shippers. These agencies would generally be "freight forwarders", but for certain dangerous goods they could also be Postal Authorities. These agencies use many items other than ULDs, such as mailbags, flash bags, satchels etc, to consolidate consignments from shippers, seal them and subsequently lodge them with airlines.

1.3 The view has been expressed that because the definition of an overpack refers only to a single shipper, the Instructions are in fact silent on the obligations of these agencies relating to overpacks, and therefore any overpack requirements in the Instructions do not legally apply to such agencies.

1.4 The Panel is invited to consider if it agrees with this opinion and, if so, consider possible amendments to the Instructions to remedy this situation.

2. PROPOSALS

2.1 **Proposal** 1. Amend the definition of an Overpack in Part 1; 3.1.1 by deleting the words "by a single shipper". The definition would then read: "Overpack. An enclosure used to contain one or more packages and to form one handling unit for convenience of handling and stowage". Comment: The "overpack" definition appears in other modal regulations; the effect of a change in definition has not been fully examined.

2.2 **Proposal 2.** Amend the definition of an Overpack in Part 1; 3.1.1 by adding the words ", or an agency that consolidates cargo " after "single shipper". The definition would then read: "Overpack. An enclosure used by a single shipper, or an agency that consolidates cargo, to contain one or more packages and to form one handling unit for convenience of handling and stowage."

— END —