International Civil Aviation Organization

WORKING PAPER

DGP-WG/05-WP/35
21/3/05

DANGEROUS GOODS PANEL (DGP)

MEETING OF THE WORKING GROUP OF THE WHOLE

Montreal, 18 to 22 April 2005

Agenda Item 3: Development of recommendations for amendments to the *Supplement* to the *Technical Instructions* for incorporation in the 2007/2008 edition

ICAO TECHNICAL INSTRUCTIONS PART 4, CHAPTER 3

(Presented by CEFIC)

1. INTRODUCTION

1.1 During the DGP-meeting in Abu Dhabi, CEFIC asked the panel to consider permitting the carriage of environmentally hazardous substances in IBCs.

1.2 Although the panel was not very enthusiastic about this proposal, CEFIC would ask for some reconsideration of the issue on the following basis:

a) the use of IBCs in air transport is not uncommon for general cargo. CEFIC recognises that the use of IBCs for dangerous goods in air transport is a new concept and should not be permitted without additional controls;

b) UN3077 and 3082 were originally adopted by the UN Committee of Experts for the 5th edition of the Recommendations (1986) at the request of IMO to deal with the implementation of MARPOL III (Marine Pollution Convention) which addresses packaged goods. IMO and ICAO adopted the UN numbers for the 1989 editions of their respective regulations. Whereas IMO defined packaging requirements, ICAO considered at the time that they were recognising these numbers to assist multimodal transport rather than adopted the numbers on the basis that there was a threat to air safety. In the Technical Instructions no packing instruction was adopted but Special Provision A81 allowed a competent authority to authorise any packaging quantity, in theory IBCs. It was not until the 1993/4 edition of the Technical Instructions that ICAO adopted a packing instruction for UN3077;

c) the recognition by ICAO that these do not present a major safety issue in air transport is recognised by the fact that in the blue pages there is “No Limit” to the quantity per

package. In addition it must be recognised that it would be possible to reclassify small IBCs as packages and this would permit their carriage under the current packing instruction up to 400 kg net;

d) CEFIC recognises that the original ICAO view that these present no hazard in air transport has been modified in the intervening years, environmentally hazardous substances are now addressed like any other dangerous substance but it still has to be recognised that these present no risk to aircraft or their passengers;

e) industry has a need to move large quantities of these substances by air for different reasons:

1) to supply customers worldwide rapidly;

2) to avoid production bottlenecks;

3) to increase volume efficiency: a large package takes less cargo space than several smaller packages;

4) efficient disposal of the package;

5) to avoid delays by the change of the mode of transport; and

6) harmonisation with the other modes of transport;

f) non hazardous goods are acceptable in such packages; and

g) this proposal also follows the decision made by the panel in relation to the use of UN and IMO portable tanks, that they are referred to in the supplement and are subject to competent authority approval.

2. PROPOSAL

2.1 Add a new chapter to the Supplement as follows:

Chapter xx
INTERMEDIATE BULK CONTAINERS (IBCs)

Parts of this chapter are affected by State Variation US 6 ; see Table A-1.

Note.— This chapter has no corresponding chapter in the Technical Instructions.

xx.1 GENERAL

UN 3077 Environmentally hazardous substance, solid, n.o.s. PG III may be carried in IBCs in air transport.

xx.1.1 IBCs may be used for the transport of dangerous goods in accordance with the provisions of this chapter only when the following conditions are met:

a) transport is on cargo aircraft (and on passenger aircraft) (only);

b) approval of the appropriate authority of the State of Origin is obtained;

c) no IBC shall exceed 1 000 kg; and

d) in order to ease the stowage, the IBC must be packed into a rigid overpack.

xx.1.2 For the purposes of the Technical Instructions and this Supplement, IBCs are rigid or flexible portable packagings, other than those specified in Chapter 6.1, that:

a) have a capacity of not more than 1.0 m^3 (1,000 litres) for solids of packing groups III;

b) are designed for mechanical handling;

c) are resistant to the stresses produced in handling and transport, as determined by tests;

xx.2 DESIGN, CONSTRUCTION, APPROVAL AND MARKING

xx.2.1 General

The provisions of Chapter 6.5 of the UN-Model Regulations/ RID/ADR / IMDG should be met

xx.3 MARKING AND LABELLING

xx.3.1 .Each IBC shall be marked with the UN number and the proper shipping name in accordance with Part 5, Chapter 2 on two opposing sides of the IBC.

xx.3.2 Each IBC shall be labelled in accordance with Part 5, Chapter 3 on two opposing sides of the IBC.

xx.4 ADDITIONAL DOCUMENTATION

The requirements concerning the dangerous goods transport document in Part 5;4.1 of the Technical Instructions must be met. When dangerous goods are shipped in IBCs under the approval of the appropriate authority of the State of Origin, a copy of the document of approval showing all relevant transport conditions must accompany the consignment.

xx.5 SPECIAL RESPONSIBILITIES OF THE OPERATOR IN ACCEPTING DANGEROUS GOODS IN IBCs

Before accepting the consignment, the operator must ensure that all applicable requirements of Part 7 of the Technical Instructions can be satisfied, particularly those in 7;2.4.2 relating to the securing of packages containing dangerous goods, and that the required approval for the package has been issued. IBCs may not be filled or discharged while aboard an aircraft.

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