DANGEROUS GOODS PANEL (DGP)

MEETING OF THE WORKING GROUP OF THE WHOLE

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

REQUIREMENT FOR AIR ELIGIBILITY MARKING

(Presented by J. Abouchaar)

1. BACKGROUND

1.1 The 2003-2004 Technical Instructions in Part 5;2.4.12 includes the requirement that shippers mark packages with a marking to identify that the shipper has complies with all of the relevant requirements applicable to air transport.

1.2 This requirement was incorporated into the Technical Instructions as a result of a paper presented by the expert from the United States at DGP/18 in October 2001, copy attached.

1.3 The paper as presented proposed that packages containing liquid dangerous goods be marked with a marking to identify that the shipper had complied with the additional requirements applicable to air transport, specifically those requiring that packagings be capable of withstanding the prescribed pressure differential for air transport.

1.4 The initial position proposed in the paper was modified based on discussion that took place at DGP/18 and the revised text was adopted and incorporated into the Technical Instructions with an effectivity of 1 January 2004.

1.5 Since the publication of the Technical Instructions, there have been a number of questions raised by shippers as to exactly which packages require the placement of the air eligibility marking. While it can be understood that packagings for certain substances, such as liquids, require that they be capable of withstanding the pressure differences experienced during air transport, there are many substances for which there are no additional requirements. The benefit of requiring the shipper to apply the air eligibility marking in these circumstances is questioned.

1.6 Some examples of where the air eligibility marking is either of no benefit, or the where the shipper has a limited ability to apply such markings are:

- explosives;
- compressed, liquefied or dissolved gases packed according to Packing Instruction 200;
- refrigerating machines (UN 2857), Div. 2.2;
- packages containing dry ice when used as a refrigerant for non-dangerous goods;
- magnetized material (UN 2807) Class 9;
- engines, internal combustion (UN 3166) Class 9;
- lithium batteries and lithium batteries packed with, or in, equipment (UN 3090 and UN 3091) Class 9;
- Vehicles (UN 3166) Class 9.

1.7 In addition, there was a specific addition to the Technical Instructions (2;7.9.7) requiring that excepted packages of radioactive materials must be marked with the air eligibility marking. However, there is no similar reference to a requirement, or lack of, for dangerous goods in excepted quantities. This introduces an element of confusion as to the requirement to apply the air eligibility marking.

1.8 Finally, in 1;2.2.2 provision is made for operators to ship dangerous goods in "containers specially designed for their transport."

2. PROPOSAL 1

2.1 Add a new paragraph to Part 5;2.4.12 as follows:

The requirements of 2.4.12 do not apply to:

- dangerous goods consigned by an operator that are packaged in specially designed containers as provided in 1;2.2.2;
- packages containing dangerous goods in excepted quantities as provided in 1;2.4;
- packages containing articles and substances in Class 1;
- Class 2 gases packed in accordance with Packing Instruction 200;
- refrigerating machines (UN 2857); and

· packages containing articles and substances in Class 9, other than as specifically identified in the Packing Instruction.

2.2 Add the following text to Packing Instructions 906, 907, Y907, 911, Y911, 913, 914, Y914, 915 and Y915:

"packages must be marked to indicate that the shipper has determined that the packaging meets the applicable air transport requirements as specified in 5;2.4.12."

3. PROPOSAL 2

3.1 If Proposal 1 is accepted, and given that the requirements of Part 5;2.4.12 do not take effect until 1 January 2004, the Panel is asked to consider publishing the text in Proposal 1 as an Addendum to the 2003-2004 Technical Instructions.

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