

DANGEROUS GOODS PANEL (DGP)**NINETEENTH MEETING****Montreal, 27 October to 7 November 2003****REPORT OF THE MEETING OF THE WORKING GROUP
OF THE WHOLE****(MONTREAL, 5 TO 9 MAY 2003)**

(Presented by the Secretary)

1. INTRODUCTION

1.1 The meeting of the Working Group of the Whole Dangerous Goods Panel was opened by Mr. G. Herpst, Chief, ICAO Operations/Airworthiness Section, on 5 May 2003. He noted that, due to unforeseen circumstances, the meeting had to be relocated and rescheduled but wished to thank Messrs. Armen and Al-Ameri for all the work they had done in preparing for the original meeting. Mrs. J. Code was elected Chairwoman of the meeting and Mr. G. Leach was elected Vice-Chairman. The Secretary of the meeting was Dr. K. Rooney. Mrs. Code, on behalf of the working group, thanked Mr. Herpst for opening the meeting and thanked Messrs Armen and Al-Ameri for all their efforts.

2. ATTENDANCE

2.1 The meeting was attended by the following panel members and advisers:

Member/Observer*	Adviser	State/International Organization
P. Steele	L. Willoughby	Australia
M. Hinoul	K. Vermeersch	Belgium
J. Code	D. Sylvestre L. Hume-Sastre S. Garneau	Canada
J. Le Tonqueze	P. Soubrier Y. Guarguir	France

Member/Observer*	Adviser	State/International Organization
	H. Brockhaus M. Philippi	Germany
	M. Apolloni A. Furia	Italy
	S. Mikawa K. Nada S. Maruo	Japan
D. Raadgers	S. Oosterhoff	Kingdom of the Netherlands
Y. Mikhin	D. Kurdchenko O. Tepljakova	Russian Federation
S-O Sanchez Serrano		Spain
G. Leach	M. Castle J.Hart R. Wells	United Kingdom
R. Richard	F. Black J. McLaughlin	United States
J. Abouchaar	N. McCulloch D. Brennan S. Gerber	IATA
W. Schuurman		IFALPA
	N. Previsani	WHO
L. Armen*	O. S. Al-Ameri A. McCulloch	United Arab Emirates IECC

3. REVIEW OF OUTSTANDING ITEMS FROM WG/02

3.1 It was noted by the Chairwoman that a number of items remained outstanding after the last working group meeting in Frankfurt. The following comments or actions related to the relevant paragraphs of the report were given (DGP-WP/02-WP/53).

- 5.1.2 Terms of reference to be developed by an ad hoc working group (It was agreed that Mr. Leach would act as facilitator)
- 5.2.4 The Secretary obtained AVSEC's approval of the draft UN working paper and reported this at the UNSCOE December 2002 meeting
- 7.1.1 Proposer to prepare revised proposal for DGP/19

- 7.6.1 See DGP-WG/03-WP/16
Working group on training to be held (It was agreed that Mr. Abouchaar would act as facilitator)
- 8.1.4.4 Revised UN proposal on diagnostic specimens approved at UNSCOE December 2002 meeting; and to be discussed at this meeting (see DGP-WG/03-WP/38). Secretary to inform the UN that
- 8.1.4.5 training should include the hazards posed by the transport of dry ice with diagnostic specimens
- 9.7.1 Withdrawn
- 9.11.1 New working group established by UNSCOE to examine limited quantities and consumer commodities (DGP-WG/03-IP8). First meeting to be held in Paris before the July 2003 UNSCOE meeting; second meeting to be held in Montreal before DGP/19 (22 to 24 October 2003)
- 10.4.1 Outstanding; Secretary to raise issue at UN
- 11.2.1 Proposer to reconsider and to ask UN members for advice
- 11.4.1 See DGP-WG/03-WP/1
- 11.6.1 IAEA Secretariat consulted by Secretary; paper to be raised at DGP/19 by IAEA
- 12.3.1 Outstanding; Secretary to raise with AVSEC
- 13.1.1 See DGP-WG/03-WP/45
- 13.2.1 See DGP-WG/03-WP/36
- 13.3.2 See DGP-WG/03-WP/46; prepared as result of information provided by Secretary
- 15.2.1 No information provided to Secretary; see DGP-WG/03-WP/23

4. ANNEX 18

4.1 **Information in the Event of an Aircraft Accident or Incident (DGP-WG/03-WP/24)**

4.1.1 A recent amendment to Annex 18 and the Technical Instructions now requires an operator to provide information to emergency personnel in the event of a serious incident. It was suggested that clarification should be provided for requiring such information for a serious incident only when relevant i.e. to limit the requirement to those serious incidents which may be relevant to dangerous goods.

4.1.2 Although there was some support for the proposals, it was pointed out that the information is only required upon request by the emergency personnel. Proposals 1 and 2 were then withdrawn.

4.1.3 A third proposal to convert the requirement contained in Note 2 under 7;4.6.2 into mandatory text was agreed.

4.2 **Information by Pilot-in-command in Case of In-flight Emergency (DGP-WG/03-WP/46)**

4.2.1 At DGP/17, the panel agreed to an amendment to Annex 18 which required the pilot-in-command to inform air traffic services of an in-flight emergency if the situation permitted. This proposed text was further amended following comments in response to the State letter which was circulated after the review by the Air Navigation Commission; this resulted in the replacement of the phrase “if the situation permits” by “as soon as time permits”.

4.2.2 A proposal to revert to the original text proposed by the panel at DGP/17 was strongly supported. It was noted the phrase “as soon as time permits” could have different implications in different languages in that it could be implied that the pilot-in-command had to communicate this information, regardless of the situation. It was agreed that the Secretary should refer the issue to the Legal Bureau for guidance and a working paper would then be prepared for DGP/19, if required.

5. SECURITY

5.1 **Guidance Material for Security Personnel (DGP-WG/03-WP/2)** **Security of Dangerous Goods in Transport (DGP-WG/03-WP/39)**

5.1.1 At the December 2002 UNSCOE meeting, new provisions on the security of dangerous goods in transport were adopted. The Secretary explained these provisions, shown as draft provisions in the Technical Instructions in WP/39, were to aid preliminary discussion. It was anticipated a joint working group composed of dangerous goods and aviation security experts would meet before the DGP/19 meeting to discuss the optimal location for these provisions i.e. whether they should be placed in Annex 18 and the Technical Instructions or in Annex 17 and the associated "*Security Manual for Safeguarding Civil Aviation against Acts of Unlawful Interference*" or in some combination of both.

5.1.2 A member argued ICAO, unlike other modes, has specific provisions for security in Annex 17 with detailed supporting guidance material in the form of the Security Manual. In his view, it was inappropriate for security issues to be dealt with by the Dangerous Goods Panel, which has no expertise in security matters, when ICAO had a dedicated panel of experts in the form of the AVSEC Panel. The proposed UN text was generally less restrictive than that in the Security Manual and consequently, if the UN text were to be placed in the Technical Instructions, this could lead to situations where shippers and operators believed they had complied with all security requirements but this would not necessarily be so. He also expressed the view that the UN text was outside of the scope of the Technical Instructions since it referred to safeguarding against theft or mis-use as opposed to safeguarding civil aviation. Accordingly, he believed the bulk of the UN provisions should be placed in Annex 17 and the Security Manual with perhaps a cross reference to those documents in both Annex 18 and the Technical Instructions.

5.1.3 An opposing view was expressed in which it was recommended that the draft provisions should be incorporated in their entirety in the Instructions. This would then reflect what was being done in the other modes and it would also facilitate the user who would be able to find all the requirements in one location. It was noted the Security Manual was a restricted document and it was queried how shippers would be able to find out their obligations in such a document.

5.1.4 A number of members expressed support for the different viewpoints expressed. On the basis of the conflicting suggestions, a number of members believed a joint working group composed of

dangerous goods and aviation security experts was essential. It was suggested legal advice should also be obtained. The Secretary said she would contact the Aviation Security section, research the availability of meeting rooms and arrange a meeting, preferably in September 2003. This would allow sufficient time before the panel meeting for further discussion to take place in members' States.

Secretarial note: WP/2 was considered by the *ad hoc* working group on security; in addition, at the request of the AVSEC section, amendments to a draft list of prohibited items were developed.

6. GENERAL REVIEW

- 6.1 **Draft Amendments to the Technical Instructions to Align to the UN Recommendations - Part 1 (DGP-WG/03-WP/3)**
Draft Amendments to the Technical Instructions to Align to the UN Recommendations - Part 2 (DGP-WG/03-WP/4)
Draft Amendments to the Technical Instructions to Align to the UN Recommendations - Part 3 (DGP-WG/03-WP/5)
Draft Amendments to the Technical Instructions to Align to the UN Recommendations - Part 4 (DGP-WG/03-WP/6)
Draft Amendments to the Technical Instructions to Align to the UN Recommendations - Part 5 (DGP-WG/03-WP/7)
Draft Amendments to the Technical Instructions to Align to the UN Recommendations - Part 6 (DGP-WG/03-WP/8)
Draft Amendments to the Technical Instructions to Align to the UN Recommendations - Part 7 (DGP-WG/03-WP/9)
Draft Amendments to The Technical Instructions to Align to the Recommendations - Table 3-1 (DGP-WG/03-WP/10)
Consolidated Amendments Arising from WG/02 (DGP-WG/03-WP/42)

6.1.1 The Secretary presented a series of papers containing draft amendments to the Technical Instructions based on the decisions of the UNCOE as reflected in the draft UNSCOE report. It was noted that the working papers for DGP/19 would be based on the approved final text.

6.1.2.1 In WP/3, the Secretary was asked to check with the Legal Bureau whether the scope of the Technical Instructions encompasses the term 'consignee' as contained in 1.3.2.6.1 a) and b).

6.1.2.2 It was suggested that text should be developed to supplement Note 1 under the definition of 'Tank'.

6.1.3.1 In WP/4, it was agreed to replace the word 'defined' in 7.1.2 d) with "specified in the definition of contamination" and that the UN be informed.

Secretarial note.- IAEA also to be informed of amendment.

6.1.3.2 It was agreed that paragraphs 7.8.2 and 7.8.3 be compared with the equivalent text in TS-R-1 and the UN Recommendations.

6.1.3.3 A member noted a corrigendum to the revised UN Recommendations was being drafted; it was agreed the Secretary would incorporate the content into the DGP/19 working paper.

6.1.3.4 It was noted the text of 9.2.1 b) did not accurately reflect UN text and that its correction would be arranged by the Secretary.

6.1.4.1 It was agreed that for special provision A97, the present second sentence and the note should be retained and placed in square brackets. It was noted that the need for a new introductory sentence should be reconsidered at DGP/19.

6.1.4.2 The Secretary was asked to research the history of special provision A138.

6.1.5 In WP/6, it was agreed to replace the word “substances” in 1.1.21 with “goods” and to inform the UN of this apparent oversight.

6.1.6.1 In WP/7, it was agreed the UN should be informed of the ICAO requirement for a package orientation label as contained in 3.2.11 b). It was queried whether the requirement in 3.4.1.1 (d) should only apply to the primary hazard label; the issue was deferred for future resolution.

6.1.6.2 It was noted that the UN requirement for an overpack mark should be included and that this would be further discussed at DGP/19.

6.1.7 WP/8 was noted.

6.1.8 In WP/9 the phrase “opening of packages” in 3.1.4 was queried. It was suggested that 3.1.5 required further clarification regarding the intent that compartments be inspected.

6.1.9 It was noted that a complete Table 3-1 would be prepared for DGP/19; WP/10 was noted.

6.1.10 WP/42 was noted.

7. **DIVISION 6.2**

7.1 **Consolidated Amendments - Division 6.2 (DGP-WG/03-WP/38)**
Consignment of Diagnostic Specimens - Interpretation/guidance Document (DGP-WG/03-WP/40)
Diagnostic Specimens % Revised Guidance Document (DGP-WG/03-WP/41)
Infectious Substances in Packing Instruction 650 (DGP-WG/03-WP/43)
Packing Instruction 650 (DGP-WG/03-WP/47)

7.1.1.1 Following the amendments to the 2003-2004 edition of the Technical Instructions for diagnostic specimens, guidance material was developed by a number of members in collaboration with the World Health Organization (WP/40). Further to comments received, a revision to this guidance material was proposed in WP/41. It was noted that classification of diagnostic specimens had always been subjective but in the 13th edition of the UN Recommendations, every effort had been made to minimize this subjectivity.

However, for the interim period, this guidance was considered to be essential for consistent interpretation in a multi-modal environment.

7.1.1.2 A general discussion then ensued on the philosophy behind the amendments, especially that pertaining to the level of risk posed by diagnostic specimens. It was suggested further clarification from the UN and the WHO on the subject would be helpful. It was pointed out that the original packing instruction 650 had been developed by IATA in response to a request from the Red Cross, to help move blood bags needed for transfusion in a safe, rapid and controlled manner. It was agreed an ad hoc working group would consider the issues further. It was suggested the amendments had heightened the awareness of the health care industry to the problem and, as a result, safety had been increased.

7.1.1.3 With regard to the proposed amendments, it was agreed, in addition to the editorial amendments, to add urine to the list of body fluids which may contain pathogens. Proposed text suggesting exceptions to the classification as diagnostic specimens were not agreed. A proposal to amend the list by removing all entries for cultures was not agreed; it was considered more user friendly to retain it even though the last sentence of Note 3 emphasized this point. It was noted that the emergency response guidance suggested the use of bleach; it was pointed out this was a corrosive and was therefore not suitable for use on board an aircraft. It was agreed additional controls and procedures were necessary for emergency response but that further information was necessary. The working group agreed to attribute the revised guidance material to the whole panel in collaboration with WHO and that it would be placed on the panel website as soon as possible.

7.1.2.1 At DGP-WG/03, it was decided to await the final decision of the UNSCOE before commenting on the amendments to diagnostic specimens and to packing instruction 650; this was now presented in WP/43. The classification changes to infectious substances resulted in some substances containing risk group 2 or 3 pathogens now being classified as diagnostic specimens and consequently packaged according to packing instruction 650 rather than 602. It was suggested a cautious approach should be taken for air transport of infectious substances on the basis that emergency response and also enforcement would be difficult to ensure when there were no requirements for labelling, documentation and acceptance checks - essential for the operator to know dangerous goods were present.

7.1.2.2 Another view of the new requirements was expressed, whereby it was suggested that safety would be increased due to a higher level of compliance with a simpler, more realistic procedure. It was noted that WHO had consulted extensively with health care experts when collaborating with the UNSCOE working group on infectious substances and that they had taken into account the likelihood of transmission vs the risk. It was also noted that substances, previously considered for inclusion as diagnostic specimens, were now classified as UN 2814 or UN2900 and that all cultures were similarly classified, thus raising the level of safety.

7.1.2.3 Suggestions that hazard communication might require further re-examination were raised. It was pointed out that if the air mode were to require a hazard label, this could have serious implications from a multi-modal viewpoint. It was agreed that all of the concerns raised in the paper should be discussed in the ad-hoc working group.

7.1.3.1 The issue of general packing requirements in relation to packing instruction 650 was next discussed (WP/47). Concern was expressed that the exclusion of this requirement might result in a shipper not paying due attention to issues such as quality, ullage, etc.

7.1.3.2 It was explained that the UN had consciously decided to include all relevant requirements in the instruction, thus minimizing the need for cross references. This had been done on the basis that the packing instruction would be used largely by people who were not dangerous goods experts but who, nevertheless, needed the information in order to correctly transport diagnostic specimens.

7.1.3.3 The issue of quality was covered by the phrase “good quality”; ullage by “constructed and closed to prevent any loss of contents”; and embrittlement by the compatibility requirement. It was suggested orientation labels were unnecessary due to the very small dimensions of the package; it was also noted these were considered suitable for transport in the mail, thus negating any orientation requirement. With regard to salvage packagings, this was considered to be irrelevant.

7.1.3.4 The issue of a solid substance e.g. a frozen organ such as a liver, becoming liquid during transport was discussed. It was agreed that the UN be requested to consider adding a note requiring packagings suitable for liquids to be used if residual liquid were present.

7.1.4.1 The complete draft amendments were presented in WP/38 and the history behind the amendments was given. It was noted that guidance material, explaining the rationale, was being developed by WHO. A detailed analysis of the provisions resulted in the following comments, all of which were to be referred to the UNSCOE for clarification or information:

- S It was suggested further clarification of the definition for cultures in 6.3.1.3 was needed due to the possibility of a person claiming a culture was developed for diagnostic purposes and thus could be classified as UN3373
- S It was suggested the text in 6.3.2.4 might be interpreted as allowing blood or blood components, if collected for blood transfusion purposes, to be exempted from the regulations even though it might contain infectious substances i.e. a complete screening may not have been completed before collection
- S A number of difficulties were expressed with paragraph 6.3.2.5. The use of the phrase “low probability” was considered to be unhelpful as it related to the old concept of infectious substances; and it was suggested this should be avoided to minimize confusion. It was queried if a sample is taken from a living person, could that sample then be considered as being exempted? Lastly, it was suggested to add the phrase “so that they no longer pose a health risk” after “deactivated” in the final sentence.
- S An apparent anomaly contained in 6.3.5.1 was raised. It was noted medical or clinical wastes, consigned as UN3291, required complete documentation, labelling and marking whereas the original sample, if containing diagnostic specimens and consigned as UN3373, only required the UN3373 mark. It was explained that waste diagnostic specimens would rarely be transported as a single item of clinical waste but rather in large quantities, thus necessitating the full requirements.
- S It was noted packing instruction 620 should be renumbered as packing instruction 602. It was agreed to add a requirement for dry ice in a similar manner to that in packing instruction 650. It was also agreed to delete the proposed text on liquids, as contained in the special packing provisions.

S With regard to packing instruction 650, it was agreed to ask the UN to specify a minimum size for the UN3373 mark and to add “Diagnostic specimen” or “Clinical specimen” beside it. It was believed the UN3373 mark was insufficient for hazard communication purposes and noted this was a multi-modal issue. It was further noted other dangerous goods besides diagnostic specimens could be present in the packaging; text was developed to require all applicable requirements and it was agreed to place this in square brackets. It was agreed clarification should be sought from the UN regarding the precedence of hazards. Additional issues were referred to the ad-hoc working group, the report of which is commented below.

7.1.4.2 The working group of the whole agreed to retain the quantity limits in the current ICAO packing instruction 650 until advice is obtained from WHO regarding any possible increased risk with the inclusion of former risk group 2 or 3 substances in Category B. It was also agreed to require the air eligibility mark and to include a requirement for overpack markings. It was decided not to include a requirement for a dangerous goods transport document nor to require an acceptance check but that alternative documentation such as an air waybill should be examined for possible use in connection with incident reporting requirements. It was recognized that further consideration should be given to communicating information regarding these substances to the pilot-in-command. Although it was recognized training was not a requirement, it was suggested guidance on Category B substances should be included.

8. GENERAL - PART 1

8.1 Application of Training Programs (DGP-WG/03-WP/16) Application of Training Programs (DGP-WG/03-WP/52) Part 1; 4.2.2 Recurrent Training (DGP-WG/03-WP/30)

8.1.1 At WG/02 a considerable discussion was raised concerning wording and interpretation of Table 1-4. As a result of the discussion it was suggested that a complete revision of the table should be undertaken; this revision was presented in WPs/16 and 52. An ad-hoc working group was established to review these papers together with further proposals in WP/30. The report of the ad-hoc working group was reviewed by the working group of the whole and the following recommendations were agreed:

- S to include a definition for freight forwarder as modified by the working group to read “a person who offers the service of arranging the transport of cargo by air”;
- S to place the word “processing” in square brackets;
- S to add a new note to Table 1-4 referring to the need for persons other than those identified in that table to receive dangerous goods training; and
- S to adopt the more logical and ordered format for the table as proposed in WP/52 but noting that the numbering would need further review.

8.1.2 A suggestion to change the focus from categories of staff to a more task oriented approach was discussed. It was suggested further development of this material may provide guidance which would be suitable for incorporation in the Supplement.

8.1.3 With regard to WP/30, it was confirmed that if a period of more than twenty four months elapsed before recurrent training, a person would not necessarily have to undertake initial training again.

Secretarial note: In addition to those listed in the report of the working group, members from France and Spain also attended.

8.2 **Exception for Dangerous Goods of the Operator (DGP-WG/03-WP/20)**

8.2.1 A proposal to extend the alleviation for dangerous goods of the operator in Part 1; 2.2.1 b) to be permitted for use on cargo aircraft was agreed.

8.3 **Flammable Solids and Organic Peroxides with Explosive Subsidiary Risk (DGP-WG/03-WP/29)**

8.3.1 The removal of a prohibition which resulted from the alignment of the Technical Instructions with the UN Recommendations was discussed. One member believed it was an inadvertent removal and should be reinserted. Another noted the current provisions required approval from all competent authorities concerned and suggested it was advisable to research the origin of the original prohibition. This was agreed.

9. **CLASSIFICATION**

9.1 **Simplification of Table 2-12 Basic Radionuclides Values for Individual Radionuclides (DGP-WG/03-WP/34)**

9.1.1 A proposal to request the IAEA to consider simplification of Table 2-12 was agreed. It was noted such simplification had existed in the 1985 edition of the IAEA Safety Series No.6 and it was believed it would reduce confusion and facilitate compliance.

9.2 **Classification of Radioactive Material (DGP-WG/03-WP/48)**

9.2.1 Paragraph 107(d) of the IAEA Regulations exempts from the regulations certain radioactive material in consumer products which has been sold to the end user. An incident involving such consumer products which had been badly packed and documented was deemed to be exempted; this was considered to be unacceptable. The working group agreed to request the IAEA to review this apparent deficiency.

10. **DANGEROUS GOODS LIST AND SPECIAL PROVISIONS**

10.1 **Special Provisions A1, A2 & A 109 (DGP-WG/03-WP/12)**

10.1.1 The decision taken at DGP-WG01 to add text to special provision A1 regarding the requirement by States for prior approval of shipments was reviewed. It was suggested the intent be clarified, noting that it was normally only the State of Origin which required such prior approval. This, together with similar proposals to align special provisions A2 and A109, was agreed.

10.2 **Wording of Special Provisions A7, A63 and A127 (DGP-WG/03-WP/17)**

10.2.1 A proposal to consolidate Special Provisions A7, A63 and A127, and as modified in Flimsy 13, was withdrawn although there was general support for the intent. It was suggested it would be preferable if the proposer first presented a paper to the UNSCOE. The proposer agreed, noting the support of the working group.

10.3 **Aircraft Batteries (DGP-WG/03-WP/21)**

10.3.1 A proposal to amend special provision A51 to permit a limit of 100 kg gross mass per package for aircraft batteries classified as UN2794 and UN2795 was agreed. It was noted that the quantity limit had shown 'no limit' in previous editions and it was queried whether the new limit would restrict some batteries from transport. It was agreed to place the amended quantity in square brackets until further information could be obtained.

10.4 **First Aid Kits (DGP-WG/03-WP/32)**

10.4.1 A proposal which sought to clarify the requirements for **First aid kits**, as contained in special provision A44, was discussed. A number of members agreed clarification would be helpful but did not think the proposed text would assist. The proposer said a revised working paper for DGP/19 might be prepared.

10.5 **Toxic by Inhalation Substances (DGP-WG/03-WP/44)**

10.5.1 A proposal to prohibit all liquids having a vapour toxicity of packing group I from transport on both passenger and cargo aircraft was agreed. The Secretary noted that the new toxic by inhalation substances, as contained in the 13th edition of the UN Recommendations, would be forbidden similarly.

10.6 **Special Provision A32 (DGP-WG/03-WP/49)**

10.6.1 The working group confirmed that air bags, when installed in vehicles or in completed components, are not subject to the Instructions on the basis that they are afforded additional protection when compared to air bags transported as individual articles.

10.7 **Approval of Prototype Lithium Batteries (DGP-WG/03-WP/53)**

10.7.1 During DGP/18 the Panel agreed to allow prototype lithium batteries that have not been subjected to the UN testing to be transported under specified conditions if approved by the appropriate authority of the State of Origin. A proposal to restrict the carriage of these batteries to cargo aircraft only was agreed, subject to an editorial amendment.

11. **PACKAGINGS AND PACKING INSTRUCTIONS**

11.1 **Lithium Cells and Batteries Low Voltage Transport Prohibition (DGP-WG/03-WP/11)**

11.1.1 A proposal to limit the prohibition contained in the last sentence of Packing Instruction 903 to cells with a liquid cathode containing sulphur dioxide, sulphuryl chloride or thionyl chloride was agreed. It was noted the present prohibition was appropriate only to certain older, primary lithium cell and battery

technologies, and was not relevant to recently developed lithium battery technologies (e.g. lithium ion, lithium polymer).

11.2 **Maximum Gross Mass For Consumer Commodities (DGP-WG/03-WP/18)**

11.2.1 An amendment to Packing Instruction 910 to align the maximum gross mass to 30 kg for consumer commodity packages with other modal regulations was agreed. It was further agreed to make a consequential amendment to Table 3-1. It was noted this amendment would be helpful to the UN working group on limited quantities and consumer commodities.

11.3 **Revised ICAO Technical Instructions Part 4, Chapter 11; Packing Instruction 900 (DGP-WG/03-WP/19 Revised)**

11.3.1 A proposal to permit **Vehicles, flammable gas powered** having gas regulators equipped with electrically operated valves that close automatically when the power is shut off or disconnected was discussed. A number of members agreed with the principle but suggested the proposed text would need to be amended to take into account various issues raised e.g. the power source should be disconnected rather than the power feed should be interrupted; the dual fuel supply in these vehicles should be clarified; the ability “to bring to a stop” a vehicle containing a hydrogen fuel cell would need clarification. The proposer withdrew the paper and said a revised proposal would be submitted to DGP/19.

11.4 **Orientation of Packages Containing Batteries (DGP-WG/03-WP/22)**

11.4.1 A proposal to align the requirement for package orientation labels in Packing Instruction 800 with that for packages containing liquid dangerous goods was agreed.

11.5 **Interpretation And Use of Part 4; 1.1.6 (DGP-WG/03-WP/25)**

11.5.1.1 The pressure differential test as contained in 4;1.1.6, was queried on the basis that the extreme conditions which a package would be expected to be capable of withstanding, did not reflect normal conditions of transport. Some members were reluctant to amend the text unless further technical information and justification was provided as they believed a decompression situation was not uncommon. It was suggested the test should cover 45,000 feet (as in JAR-OPS) and also for a pressure surge. It was agreed further information was necessary before any decision could be taken to amend the text.

11.5.1.2 With regard to the need for more clearly specifying a test, it was agreed a test should be specified in the Technical Instructions as this would assist enforcement. It was noted the test should take both rigid and flexible packagings into account.

11.6 **Aircraft Evacuation Slide Cylinders Containing an Actuating Cartridge (DGP-WG/03-WP/54)**

11.6.1 A proposal to **amend packing instruction 905** to permit cylinders containing actuating cartridges (previously classified as Gas generator assemblies, ID8013 and deleted at DGP/18) was agreed. It was also agreed to include this amendment in the Addendum.

11.7 **Interpretation and Use of 4;1.1.10.2 (DGP-WG/03-WP/55)**

11.7.1 The exception for absorbent material requirements contained in 4;1.1.10.1 was discussed. Some members believed revised text was necessary so that misinterpretation, resulting in completely excepting all combination packagings from absorbent material requirements, would be reduced. Others felt a more cautious approach was necessary, arguing that changes to the text might result in package design test having to be redone with a resultant high cost to industry. It was agreed industry (both shippers and packaging manufacturers) should be consulted in order for a revised paper to be submitted for DGP/19.

12. SHIPPER'S RESPONSIBILITIES

12.1 Signature on Dangerous Goods Transport Document (DGP-WG/03-WP/1)

12.1.1 Part 5; 4.1.1 and 4.1.12 of the Technical Instructions require that the person offering dangerous goods for transport provide a dangerous goods transport document containing a declaration signed by the person who offers the goods for transport. It was suggested the person who signed the document must also have seen the consignment. However, the working group confirmed that the person who signs accepts responsibility for the total procedure and therefore, does not need to view the consignment. It was noted that for many shippers, preparation of the consignment took place as a separate location from that for documentation.

12.2 Marking of Radioactive Material Excepted Packages (DGP-WG/03-WP/14)

12.2.1 A proposal to align Part 2;7.9.1(a) with the IAEA TS-R-1 paragraph 535 and UN paragraph 5.2.1.5.2 requiring excepted packages of radioactive material to bear only the UN number was agreed. It was noted that this decision reversed that made by the panel at DGP/17. It was agreed the Secretary would notify IAEA of the decision.

12.3 Air Eligibility Marking (DGP-WG/03-WP/37)

12.3.1 The new requirement for an air eligibility package marking and comments received by potential users were discussed. It was agreed that the word “packagings” should be replaced by “packages” since this was believed to be more appropriate in conveying the requirement that dangerous goods packages meet the applicable air transport requirements. It was also agreed to delete the text relating specifically to limited quantities. A further proposal to clarify what was meant by “the applicable air transport requirements” was not agreed. Since the new mark is mandatory from 1 January 2004, it was agreed the amendments would be included in the Addendum.

12.3.2 The usefulness of an air eligibility mark for those packages containing certain articles or classes of dangerous goods was then questioned. A number of members agreed with the principle that exclusions for certain items should be included but there was no agreement with regard to the specific text. It was agreed further discussion was necessary and that this could be by correspondence and at DGP/19

13. OPERATOR'S RESPONSIBILITIES

13.1 Loading Exception for Radioactive Material Excepted Packages (DGP-WG/03-WP/13)

13.1.1 The working group confirmed that radioactive material in excepted packages should not be permitted in an aircraft cabin occupied by passengers or on the flight deck and agreed to amend Part 7;2.1 as proposed in the working paper.

13.2 **Minor Discrepancies (DGP-WG/03-WP/28)**

13.2.1 It was suggested that a note to Part 3; 2.1.1 which had been added at DGP/19 would be better placed in Part 7;1.1.2 since the majority of problems associated with minor discrepancies occur during acceptance, this was agreed.

13.3 **Indication in Operations Manual of Maximum Quantity of Dry Ice Per Cargo Compartment (DGP-WG/03-WP/33)**

13.3.1 The potential hazard posed to passengers and crew by the venting of dry ice was discussed. It was agreed information on the maximum quantity of dry ice permitted in each cargo compartment must be provided by an operator in appropriate manuals.

13.4 **Location of Notices at Airports (DGP-WG/03-WP/35)**

13.4.1 The provision of information to passengers by means of notices at airports was discussed. Although there was agreement with the principle of providing clarity, a number of issues were raised which were thought necessary for further discussion. These included the increasing use of electronic ticketing machines at check-in, electronic tickets and the advisability of including the language of the State in which the airport was located in addition to English. The proposer said a revised working paper, which would take the above comments into account, would be presented at DGP/19.

14. **EMERGENCY RESPONSE**

14.1 **Aircraft Emergency Response Drill - Infectious Substances, Affecting Humans, UN 2814 and Infectious Substances, Affecting Animals, UN 2900 (DGP-WG/03-WP/36)**

14.1.1 The use of the drill letter L for infectious substances emergency response and its inappropriateness in conveying the unique safety requirements was presented. The working group agreed to a new drill code Y but decided one drill number (11) was sufficient for division 6.2 substances. It was further agreed that text for “Additional considerations” as presented for radioactive material would be more suitable for inclusion for these entries than that proposed.

14.2 **Emergency Response Guidance for Aircraft Incidents Involving Dangerous Goods ICAO Doc 9481-AN/928 (DGP-WG/03-WP/45)**

14.2.1 At DGP-WG/02, it was noted further expert information was required in order to develop procedures for powder spills. Since then, such information was received which resulted in a proposal to develop new procedures for such spills. This was agreed.

15. PROVISIONS FOR PASSENGERS AND CREW

15.1 **Self-inflating Life Jackets (DGP-WG/03-WP/27)**

15.1.1 An editorial correction was noted; the Secretary explained it was already included in the forthcoming Corrigendum.

16. REFORMATTING PACKING INSTRUCTIONS

16.1 **Packing Instructions (DGP-WG/03-WP/51)**

16.1.1 On the basis of the discussion at DGP-WG/02 and comments received after the meeting, revised draft packing instructions for dangerous goods in classes 3, 4, 5, 6, 8 and 9 were presented for comment. It was explained that the format and style would be finalised with the Secretary, following consultation with the English Editorial unit e.g. use of “forbidden” or “prohibited” or “not allowed” .

16.1.2 Members expressed their congratulations and thanks to the proposers, recognizing the huge effort it involved. It was noted that, based on the rationalised approach, simplification would be achieved through the reduction in the number of packing instructions; this would be very helpful for users. It was also noted that a thorough review of the content of the proposed instructions would take considerable time. Although one member queried having the same packing number for both passenger and cargo aircraft packing instructions, it was explained this situation presently existed but without any apparent justification or rationale; the reformatting exercise was based on taking a consistent, rationalised approach. It was agreed that the packing instruction number would be the same as that for the UN but only if the details were identical; if any differences existed, then a new, different packing instruction number would be assigned.

16.1.3 The proposed layout for Table 3-1 was then discussed. It was stressed this was just one possible approach. The need to maintain columns for labels and state variations was raised. It was agreed a revised layout would be presented for DGP/19.

16.1.4 The issue of when the reformatted packing instructions would be incorporated was then discussed. It was agreed that the intent was to complete the work in this biennium but that if significant problems were encountered, then it would continue into the next. Some members believed the scale of the proposed changes to the instructions was so great that a deferred implementation would be necessary in order to allow users sufficient time to become accustomed to the reformatted style and content; others suggested an awareness campaign might be necessary. Alternatively, a transition period might be most helpful to users as there would be a huge impact on industry. Some members questioned how a transitional period could be applied but it was pointed out this was the regular practice for other modes. It was agreed this issue would need to be further discussed at DGP/19.

16.2 **Reformatting of Packing Instructions (DGP-WG/03-WP/15)**

16.2.1 This working paper was withdrawn on the basis that the comments had been incorporated into DGP-WG/03-WP/51

16.3 **Reformatting of Packing Instructions - Compatibility (DGP-WG/03-WP/56)**

16.3.1 At DGP-WG/02, comments on the issue of compatibility with regard to the new packing instructions were raised. It was noted that detailed information was presented in the current instructions but that the requirements would now be contained in the general requirements to Part 4. Proposed text detailing more specific considerations which the shipper should give to compatibility were then discussed. A number of members agreed with the principle but suggested further thought regarding the specific text and optimum location was necessary. The proposer agreed to present a revised paper for DGP/19.

17. **SUPPLEMENT**

17.1 **Transport of Dangerous Goods on Passenger Aircraft Without Class B or C Main Deck Cargo Compartments (DGP-WG/03-WP/23)**

17.1.1 Following the adoption of provisions at DGP/18 permitting the carriage of certain dangerous goods on aircraft not equipped with Class B or C main deck cargo compartments, it was noted a number of dangerous goods which were unsuitable for such carriage had been inadvertently included in the list of permitted items and one item (oxygen) which had been excluded. It was agreed to maintain the information in the Supplement rather than by adding a special provision to Table 3-1 and to correct the list in S-5;2.2.2. The proposer offered to update the list which would then be sent to the Secretary.

18. **MISCELLANEOUS**

18.1 **Inspections (DGP-WG/03-WP/26)**

18.1.1 Although Annex 18, paragraph 11.1 requires States to establish inspection procedures, many States do not have the resources or knowledge to develop such programmes. Members agreed it would be beneficial to develop guidance material on inspection procedures for inclusion in the Supplement to the Technical Instructions. It was agreed that States with written Inspection Procedures should provide the proposer with a copy to assist in the development of such material.

18.2 **Validity of the Technical Instructions (DGP-WG/03-WP/31)**

18.2.1 The difficulty a number of States experienced with the late availability of the 2003-2004 edition of the Technical Instructions whilst attempting to adopt the Instructions into national law was discussed. It was agreed the Secretary should obtain guidance on the legal status of the Technical Instructions from the Legal Bureau and that this should be presented in a working paper for DGP/19.

18.3 **Opening of Packages by Customs and Other Authorities (DGP-WG/03-WP/50)**

18.3.1 The problem of packages containing dangerous goods being opened by Customs or other authorities and then being resealed without expert guidance was discussed. A proposal to develop text similar to that contained in paragraph 581 of the IAEA Regulations (TS-R-1) was welcomed.

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