



**WORKING PAPER**

**DANGEROUS GOODS PANEL (DGP)**

**TWENTY-SEVENTH MEETING**

**Montréal, 16 to 20 September 2019**

**Agenda Item 2: Managing air-specific safety risks and identifying anomalies**

**2.3: Develop proposals, if necessary, for amendments to the *Supplement to the Technical Instructions for the Safe Transport of Dangerous Goods by Air (Doc 9284SU)* for incorporation in the 2021-2022 Edition**

**REVISIONS TO RECOMMENDATIONS ON ISSUANCE OF APPROVALS AND EXEMPTIONS**

(Presented by D. Brennan)

**SUMMARY**

This working paper proposes revisions to the Supplement to the Technical Instructions to include additional recommendations to States when issuing approvals and exemptions.

**Action by the DGP:** The DGP is invited to consider the proposal set out in the appendix to this working paper.

**1. INTRODUCTION**

1.1 At the nineteenth working group meeting of the Dangerous Goods Panel (DGP-WG/19, Montréal, 1 to 5 April 2019), two working papers were presented (DGP-WG/19-WP/10 and DGP-WG/19-WP/25) that raised questions on the information provided by authorities when issuing exemptions and approvals and also the interaction between shippers seeking approvals and exemptions, the authorities considering issue of these approvals or exemptions and operators being requested to carry dangerous goods under an approval or exemption.

1.2 There was support for the development of additional guidance material that would support member States when issuing approvals and exemptions, although some members expressed concern that any guidance should not be too prescriptive or suggest that, for example the packing instructions in the Supplement were the only method of achieving the required level of safety.

1.3 This working paper tries to take those comments into account in proposing recommendations to States on considerations for approvals and exemptions, including that when considering a request from a shipper that the State should recommend to the shipper that an operator willing to carry the cargo should be identified in advance. This is particularly important as the State of the Operator should consider the operator's capability to carry the dangerous goods under approval or exemption.

1.4 The proposal also includes recommendations on the inclusion of the packing instruction with the approval or exemption where the packing instruction referenced does not exist in the Technical Instructions. Providing the applicable packing instruction with the approval or exemption supports the acceptance process by the operator and ensures that the operator can properly verify, to the extent possible, that the shipper has complied with the applicable provisions of the approval or exemption.

## 2. ACTION BY THE DGP

2.1 The DGP is invited to consider the changes proposed to the content of the Supplement to the Technical Instructions as shown in the appendix to this working paper.

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APPENDIX

PROPOSED AMENDMENT TO PART S-1 OF THE SUPPLEMENT  
TO THE TECHNICAL INSTRUCTIONS

Part S-1

GENERAL

(ADDITIONAL INFORMATION  
FOR PART 1 OF THE  
TECHNICAL INSTRUCTIONS)

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ATTACHMENT I TO CHAPTER 1

GUIDANCE FOR PROCESSING EXEMPTIONS AND APPROVALS FOR THE  
SAFE TRANSPORT OF DANGEROUS GOODS BY AIR

A. General Guidance

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**Who must obtain an exemption or approval?**

The responsibility for obtaining an approval or exemption may rest with the operator or with the shipper or with both depending on the nature of the request and on State procedures. The shipper should be requested to identify an operator that is prepared to carry the cargo should the approval or exemption be issued. It is also useful for States to include the operator in the consideration of the conditions that will apply to the approval or exemption so that the operator is able to conduct a specific safety risk assessment for the planned operation.

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**What packaging standards should be considered?**

Where an entry in Table S-3-1 has a number in parenthesis after the word "Forbidden", this refers to a packing instruction which contains the method of packing that should be specified when issuing an exemption. As much as possible, appropriate packing instruction numbers are indicated in columns 10 to 13 of Table S-3-1 and the associated detailed requirements appear in Part S-4, where these are additional to those given in the Technical Instructions.

Where the approval or exemption references a packing instruction that is not included in the Technical Instructions, it is recommended that the approval or exemption document that is issued include the packing instruction, or at least those parts that are required by the operator when performing their acceptance check of the consignment.

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