



**WORKING PAPER**

**DANGEROUS GOODS PANEL (DGP)  
WORKING GROUP MEETING (DGP-WG/15)**

Montreal, 27 April to 1 May 2015

**Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2017-2018 Edition**

**FORMAT AND STRUCTURE: INSTRUCTIONS VS RECOMMENDATIONS**

(Presented by B. Firkins)

**SUMMARY**

Annex 18 sets out Standards and Recommendations on the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284).

Standards appear in normal typeface, whilst Recommendations are prefaced with the term “Recommendation” and appear in italic typeface.

The ICAO Technical Instructions also has “Instructions” which appear in normal typeface and many recommended or advisory practises in italic typeface.

There are also a number of “recommendations” in the ICAO Technical Instructions which appear in normal typeface.

**Action by the DGP-WG:** The DGP is invited to discuss whether there ought to be a consistency in language and layout between Annex 18 and the Technical Instructions. If there is support for change, then a more complete review of the Technical Instructions will be prepared for DGP/25.

**1. INTRODUCTION**

1.1 Annex 18 sets out Standards and Recommendations on the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284).

1.2 Standards appear in normal typeface, whilst Recommendations are prefaced with the term “Recommendation” and appear in italic typeface.

1.3 The ICAO Technical Instructions are considered to be “Instructions”, and therefore mandatory; and which appear in normal typeface. There are many recommended or advisory practises in italic typeface.

1.4 There are also a number of “recommendations” in the ICAO Technical Instructions which appear in normal typeface.

1.5 The Technical Instructions are developed primarily in English. It is expected that the official ICAO language versions will accurately reflect the direct intentions when translating the mandatory terms of “Will” and “Must”, as well as the optional or recommended “Should” or “Ought”. It is also envisaged that where a State provides a translated version of the Technical Instructions into a non-ICAO language, then the mandatory and recommended distinctions will be accurately translated.

1.6 For many people and nations in the world, the six ICAO languages are not a first language; and there are States that will not be in a position to provide a timely translation of the Technical Instructions into their native language.

1.7 It is considered that amending the Technical Instructions into a consistency with Annex 18, will assist States, Operators and employees, particularly in non-ICAO language States.

1.8 Some examples of how this might proceed and appear are provided at Appendices A-D.

1.9 If there is support for change, then a more complete review of the Technical Instructions will be prepared for DGP/25.

1.10 Participants from DGP/24 will recall that in the post-meeting review, it was suggested that the first week of DGP/25 could be formed by a smaller working group to work through the less contentious matters arising from harmonisation with the 19<sup>th</sup> Edition of the UN Model Regulations.

1.11 Given the anticipated large body of work that this proposal could generate, including a consequential flow into the IATA DGRs, it is suggested that the bulk of the work should be completed by a small working group in the first week.

## **2. ACTION BY THE DGP-WG**

2.1 The DGP is invited to discuss whether there ought to be a consistency in language and layout between Annex 18 and the Technical Instructions and to provide comments and suggestions.

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## APPENDIX A

### PROPOSED AMENDMENT TO PART 1 OF THE TECHNICAL INSTRUCTIONS

An example of where a Note would be changed to reflect a recommendation.

#### Part 1

#### GENERAL

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#### Chapter 1

#### SCOPE AND APPLICABILITY

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##### 1.2 GENERAL TRANSPORT REQUIREMENTS

| 1.2.1 Except as otherwise provided for in these Instructions, no person may offer or accept dangerous goods for international civil transport by air unless those goods are properly classified, documented, certificated, described, packaged, marked, labelled and in the condition for shipment required by these Instructions. If a person performs a function required by these Instructions on behalf of the person who offers the dangerous goods for transport by air or on behalf of the operator, that person must perform that function in accordance with the requirements of these Instructions. No person may transport dangerous goods by air unless those goods are accepted, handled and transported in accordance with these Instructions. No person may label, mark, certify or offer a packaging as meeting the requirements of these Instructions unless that packaging is manufactured, fabricated, marked, maintained, reconditioned or repaired as required by these Instructions. No person shall carry dangerous goods or cause dangerous goods to be carried aboard an aircraft in either checked or carry-on baggage or on his/her person, unless permitted by 8;1.1.2.

| ~~Note—~~1.2.2 *When dangerous goods intended for air transport are carried by surface transport to or from an aerodrome, any other applicable national or modal transport requirements should be met in addition to those that are applicable for the goods when carried by air.*

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## APPENDIX B

An example where an existing “Instruction”, which contains a recommendation, would be separated out and identified.

### Part 1

### GENERAL

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### Chapter 4

### TRAINING

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4.1.2 Dangerous goods training programmes required by 4.1.1 b) must be subjected to review and approval by the appropriate authority of the State of the Operator. Dangerous goods training programmes required by 4.1.1 h) must be subjected to review and approval by the civil aviation authority of the State where the mail was accepted by the designated postal operator. Dangerous goods training programmes required by other than 4.1.1 b) and h) should be subjected to review and approval as determined by the appropriate national authority.

Would become:

4.1.2 Dangerous goods training programmes required by 4.1.1 b) must be subjected to review and approval by the appropriate authority of the State of the Operator. Dangerous goods training programmes required by 4.1.1 h) must be subjected to review and approval by the civil aviation authority of the State where the mail was accepted by the designated postal operator.

| 4.1.3 Dangerous goods training programmes required by other than 4.1.1 b) and h) should be subjected to review and approval as determined by the appropriate national authority.

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## APPENDIX C

An example of where an existing piece of text could become a Note.

### Part 5

## SHIPPER'S RESPONSIBILITIES

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### Chapter 3

## LABELLING

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### 3.2 APPLICATION OF LABELS

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3.2.12 In addition to the class hazard labels specified in 3.1, handling labels must also be affixed to packages of dangerous goods as follows:

- a) the "Cargo aircraft only" label (Figure 5-25) must be affixed:
  - 1) when the package containing the dangerous goods may only be transported on a cargo aircraft. However, where the packing instruction number and the permitted quantity per package are identical for passenger and cargo aircraft, the "Cargo aircraft only" label should not be used;

...

Would then become:

3.2.12 In addition to the class hazard labels specified in 3.1, handling labels must also be affixed to packages of dangerous goods as follows:

- a) the "Cargo aircraft only" label (Figure 5-25) must be affixed:
  - 1) when the package containing the dangerous goods may only be transported on a cargo aircraft.

| *Note: However, where the packing instruction number and the permitted quantity per package are identical for passenger and cargo aircraft, the "Cargo aircraft only" label should not be used;*

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## APPENDIX D

An example of a Note that could be a little more problematic, not only in that it contains mandatory items but might be contrary to State Government variations.

### Part 5

## SHIPPER'S RESPONSIBILITIES

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### Chapter 4

## DOCUMENTATION

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### 4.1 DANGEROUS GOODS TRANSPORT INFORMATION

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#### 4.1.5 Information required in addition to the dangerous goods description

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##### 4.1.5.8 Additional requirements

4.1.5.8.1 The dangerous goods transport document must also contain:

- a) except for radioactive material, the packing instruction applied. For shipments of lithium batteries prepared in accordance with Section IB of Packing Instruction 965 or Packing Instruction 968, the letters "IB" must be added following the packing instruction number;
- b) when applicable, reference to Special Provision A1, A2, A4 or A5;
- c) a statement indicating that the shipment is within the limitations prescribed for either passenger and cargo aircraft or cargo-only aircraft, as appropriate;

*Note.— To qualify as acceptable for transport aboard passenger aircraft, passenger aircraft packing instruction number(s) must be used, and the package must not bear the "Cargo aircraft only" label. To qualify as acceptable for transport aboard cargo-only aircraft, cargo aircraft packing instruction number(s) must be used, and the package must bear the "Cargo aircraft only" label; or passenger aircraft instruction number(s) must be shown and no "Cargo aircraft only" label applied. However, where the packing instruction number(s) and the permitted quantity per package are identical for passenger and cargo aircraft, the "Cargo aircraft only" label should not be used.*

The Note might then become:

##### 4.1.5.8 Additional requirements

4.1.5.8.1 The dangerous goods transport document must also contain:

- a) except for radioactive material, the packing instruction applied. For shipments of lithium batteries prepared in accordance with Section IB of Packing Instruction 965 or Packing Instruction 968, the letters "IB" must be added following the packing instruction number;
- b) when applicable, reference to Special Provision A1, A2, A4 or A5;
- c) a statement indicating that the shipment is within the limitations prescribed for either passenger and cargo aircraft or cargo-only aircraft, as appropriate;

~~Note.— 4.1.5.8.1.c).1~~ To qualify as acceptable for transport aboard passenger aircraft, passenger aircraft packing instruction number(s) must be used, and the package must not bear the "Cargo aircraft only" label.

4.1.5.8.1.c).2 To qualify as acceptable for transport aboard cargo-only aircraft, cargo aircraft packing instruction number(s) must be used, and the package must bear the “Cargo aircraft only” label; or passenger aircraft instruction number(s) must be shown and no “Cargo aircraft only” label applied.

4.1.5.8.1.c).3 ~~However,~~ where the packing instruction number(s) and the permitted quantity per package are identical for passenger and cargo aircraft, the “Cargo aircraft only” label should not be used.

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— END —