



**WORKING PAPER**

**DANGEROUS GOODS PANEL (DGP)  
MEETING OF THE WORKING GROUP OF THE WHOLE**

**Beijing, China, 25 October to 3 November 2006**

**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 2009/2010 Edition**

**2.1: Part 1 — General**

**WORKING PAPER ON UNIT LOADS TO 30<sup>TH</sup> MEETING  
OF THE UN SUBCOMMITTEE**

(Presented by D. Brennan)

**SUMMARY**

This paper presents a paper that has been submitted to the UN Subcommittee proposing amendments to the UN Model Regulations.

Action by the DGP-WG is in paragraph 2.

**1. INTRODUCTION**

1.1 Attached to this working paper is a copy of a paper that has been submitted to the 30<sup>th</sup> meeting of the UN Subcommittee proposing amendments to the UN Model Regulations.

1.2 The proposed amendments would introduce into the Model Regulations definitions for 'freight forwarder' and 'unit load'. It is then proposed to revise slightly the marking requirements for overpacks, to introduce a requirement for an overpack to be identified on the dangerous goods transport document and then to identify the responsibilities of a freight forwarder when creating a unit load.

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

2.1 The DGP-WG is invited to comment on the amendments proposed in the attached paper. It is then proposed that the Secretary provides these comments to the December meeting of the UN Subcommittee.

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**COMMITTEE OF EXPERTS ON THE TRANSPORT OF  
DANGEROUS GOODS AND ON THE GLOBALLY  
HARMONIZED SYSTEM OF CLASSIFICATION  
AND LABELLING OF CHEMICALS**

Sub-Committee of Experts on the  
Transport of Dangerous Goods

Thirtieth session  
Geneva, 4-12 December 2006  
Item 2a of the provisional agenda

***MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS  
ON THE TRANSPORT OF DANGEROUS GOODS***

Assembly of Packages by Freight Forwarders

Transmitted by the International Air Transport Association (IATA)

**Referenced documents from the 29<sup>TH</sup> session:**

ST/SG/AC.10/C.3/2006/18

UN/SCETDG/29/INF 31

UN/SCETDG/29/INF 8

**Background**

1. At the 29<sup>th</sup> session, there was discussion on proposed amendments to the definition and application of overpacks put forward by FIATA (ST/SG/AC.10/C.3/2006/18). UN/SCETDG/29/INF 8, submitted by IATA, raised some concerns about the FIATA proposals and subsequently there was no adoption of the FIATA proposals.
2. The FIATA paper did identify that there are operational issues for freight forwarders in being able to combine multiple packages from one or more consignors for ease of handling. During the discussion, an intervention by a member of the delegation from Belgium indicated that the IMDG Code had addressed at least part of the issue with the inclusion of a definition of “unit load” and

instructions in Chapter 5.1 of Volume 1 of the Code regarding the use of overpacks and unit loads. This approach may offer a way forward.

3. Based on suggestions from a number of delegations, discussion has taken place intersessionally between IATA and FIATA to consider the broader issues and ways that these can be addressed within the Model Regulations. These discussions have looked at the role of the freight forwarder in dangerous goods transport and consideration of formally recognising the freight forwarder in the transport regulations as well as the operational aspects of how packages are handled and loaded into transport units or conveyances.
4. Freight forwarders play an important role in facilitating the movement of cargo, including dangerous goods, by all modes of transport. They act on behalf of the consignor by providing services such as: negotiating and arranging transportation of cargo, generating commercial transport documentation, such as air waybills, arranging or providing warehousing, etc. Where the freight forwarder generates the dangerous goods transport document described in Chapter 5.4, then the freight forwarder becomes a “consignor”, as defined.
5. Despite this activity, the Model Regulations do not recognise or identify the existence of freight forwarders. The ICAO Technical Instructions incorporated a definition of ‘freight forwarder’ into the 2005-2006 edition, but this was done only to more clearly specify the application of dangerous goods training requirements for persons who handle dangerous goods being transported by air.

### **Proposal 1**

It is proposed to add the following definitions in 1.2.1:

*Freight forwarder* means a person or organization who provides services that relate to the transport (by any means), consolidation, storage, handling or distribution of dangerous goods and non-dangerous goods.

*Unit load* means an enclosure used to contain one or more packages to form one unit for convenience of handling and stowage during transport, but does not include an overpack.

*Examples of unit loads are a number of packages:*

- (a) *placed or stacked on to a load board such as a pallet and secured by strapping, shrink wrapping, stretch wrapping, or other suitable means;*
- (b) *placed in a protective outer packaging such as a box or crate;*
- (c) *permanently secured together in a sling;*
- (d) *placed in an aircraft container or aircraft pallet.*

**Proposal 2**

It is proposed to revise the marking requirements for overpacks, set out in 5.1.2.1, to make the marking of an overpack mandatory. In this way an overpack will not be confused with a unit load. The proposed text would read as follows:

5.1.2.1 An overpack shall be marked with the word “OVERPACK”. Unless the marks and labels that identify each of the dangerous goods in the overpack are visible through the overpack, the overpack shall have displayed on it the proper shipping name, the UN Number and the label, required by Chapter 5.2, for each of the dangerous goods contained in the overpack.

**1.1.1 Proposal 3**

It is proposed that the consignor be required to identify on the dangerous goods transport document when an overpack is used. This requirement would serve to clearly identify what is being presented for transport. The text would be added as a new 5.4.1.5.9, as follows:

**5.4.1.5.9 *Overpacks***

When an overpack is used, the words “OVERPACK USED” shall be inserted on the dangerous goods transport document in a manner that will clearly and immediately identify those dangerous goods that are contained in the overpack.

**Proposal 4**

The last step is to introduce requirements that define what a freight forwarder may do when assembling a unit load. It is proposed that this should be reflected in a new 7.1.1.10 as follows:

7.1.1.10 A freight forwarder may create a unit load provided that:

- (a) packages are placed in a unit load in accordance with the segregation requirements of 7.1.2; and
- (b) the marks and labels of each of the dangerous goods in the unit load are visible. Where this cannot be achieved, the freight forwarder shall display on the outside of the unit load enclosure the proper shipping name, the UN Number and the label, in accordance with the requirements in Chapter 5.2, for each of the dangerous goods contained in the unit load; or
- (c) the unit load is appropriately marked, labelled and placarded.

*Note: Modal regulations or carrier requirements may apply restrictions on the type and/or quantity of dangerous goods that may be placed in a unit load.*