



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

2.5: Part 5 — Shipper's Responsibilities

OVERPACKS

(Presented by D. Brennan)

SUMMARY

This paper proposes amendments to Part 5;1.1 in order to clarify requirements applicable to marking of overpacks.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 The general requirements set out in Part 5;1.1 and specific requirements in Part 5;2.4.9 applicable to marking of overpacks were revised in the 2005-2006 edition of the Technical Instructions.

1.2 These amendments removed the requirement for the shipper to mark an overpack to identify, where applicable, that the overpack contained UN specification packagings. Instead an overpack containing UN specification or non-specification packagings must now be marked, when applicable, with the word "Overpack".

1.3 In reflecting these changes, which originated from the UN Model Regulations, the applicable paragraphs of 5;1.1 were revised. Specifically the text of 5;1.1 h) was re-written to reflect that "The overpack marking is an indication that packages comply with prescribed specifications."

1.4 However, paragraph h) was also revised to add a new sentence as follows:

h) packaging specification markings need not be reproduced on the overpack ...

1.5 The addition of this sentence, which does not appear in the equivalent section of the UN Model Regulations, is causing some confusion with shippers, with some believing that it is acceptable to reproduce the UN specification markings on the outside of an overpack where the package markings are not visible. This is particularly the case as in the requirement that applied prior to 2005 there was no suggestion that UN specification marking needed to be, or could be, reproduced on the outside of the overpack.

1.6 Further, in the process of developing this paper it was identified that the requirements of paragraph h) were effectively duplicated with the text in paragraph k) of Part 5;1.1. In addition the requirements for marking an overpack in paragraph 5;1.1 g) were repeated in Part 5;2.4.9, which contains the specific marking requirements for overpacks. It's believed that the specific requirements should only appear in Part 5, Chapter 2.

1.7 Finally, the text in paragraph 5;1.1 k) states in part “The “overpack” marking is an indication of compliance ...”. But at this point in the Technical Instructions there has been no reference to the overpack marking as this is contained within Chapter 2 of Part 5. It is therefore suggested that 5;1.1 k) should contain a reference that the “overpack” marking is that set out in 5;2.4.9 a).

2. ACTION PROPOSED

2.1 *Delete* paragraphs 5;1.1 g) and h) and *renumber* following paragraphs accordingly.

2.2 *Amend* paragraph 5;1.1 k), which, if the first proposal is accepted, will become paragraph i), to read as follows:

~~k~~i) each package contained within an overpack is properly packed, marked, labelled and is free of any indication that its integrity has been compromised and in all respects is properly prepared as required in these Instructions. The “overpack” marking described in 2.4.9 a) is an indication of compliance with this requirement. The intended function of each package must not be impaired by the overpack.

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