



**WORKING PAPER**

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

**Memphis, 30 April to 4 May 2007**

**Agenda Item 5: Resolution, where possible, of the non-recurrent work items identified by the Air Navigation Commission or the panel  
5.2: Reformatting of the packing instructions**

**COMMENTS ON PROPOSED PACKING INSTRUCTIONS**

(Presented by CEFIC)

**SUMMARY**

This paper comments on the proposed new packing instructions by CEFIC. CEFIC supports the comments made by DGAC in DGP-WG/07-WP/62.

**1. INTRODUCTION**

1.1 CEFIC and its associated members have reviewed the draft packing instructions in detail. We submitted all our comments by means of an Excel file to ICAO. This file contained the following worksheets:

- Part 1 – Identification;
- Part 2 – General comments (according the survey);
- Part 3 – Specific comments (according the survey);
- Part 4 – Other Aspects (not covered by the survey)

As our position file contained a huge number of details, they cannot be reflected in this IP. Our file is being sent separately by e-mail to the members and advisers of the ICAO-DGP.

## 2. **GENERAL COMMENTS**

2.1 CEFIC fully supports the concerns and points raised by DGAC in their working paper DGP-WG/07-WP/62. We are therefore not going to repeat the arguments listed in their paper.

## 3. **RECOMMENDATION**

3.1 The proposed packing instructions would cause immense costs for industry without any safety improvement or simplification. As we would end up with two different systems (for classes 1, 2, 6.2, 7 and for 3, 4, 5, 6.1, 8, 9), packing of dangerous goods would not be easier: we would be faced with more errors and improperly packed dangerous goods. We therefore recommend that the current proposed packing instructions are not adopted.

— END —