



WORKING PAPER

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

Memphis, 30 April to 4 May 2007

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

2.7: Part 7 — Operator's Responsibilities

ACCEPTANCE

(Presented by G. A. Leach)

SUMMARY

This paper seeks to clarify what is expected of the operator when accepting dangerous goods.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 At WG07, WP/1 invited discussion on whether the requirements of Part 7;1.1.2 was clear in respect of what an operator is expected to verify during an acceptance check. There was general support of the idea of clarifying the existing text, without being too prescriptive, and this is what this paper seeks to do.

1.2 In preparing this paper, consideration has been given to what the purpose of the acceptance check is. It is suggested that the purpose for the operator is to establish, as far as is reasonable, that the external condition of, and quantity declared as being contained in the package complies with the Technical Instructions and also that the documentation meets the requirements. It is suggested the lack of clarity in the Technical Instructions has given rise to very long checklists, sometimes containing in excess of 50 items to check, so as to cater for most possible interpretations of the requirements by States, and thus avoid possible enforcement action.

1.3 Taking account of the discussion at WG07, it is suggested that the following aspects should be specifically verified by the operator:

Dangerous Goods Transport Document

The quantity of dangerous goods is within the limits per package on a passenger or cargo aircraft as appropriate (*new requirement*);

Package

- a) The marking of the package etc. accords with the details stated on the Dangerous Goods Transport Document and is clearly visible (*clarification of existing text which only states that the package etc should be “properly” marked*);
- b) The specification marking, if applicable, is suitable for the packing group of the dangerous goods contained within (*new requirement*);
- c) The labelling of the package etc. is as required by column 5 of Table 3-1 and 5;3 (*clarification of existing text which only states that the package etc should be “properly” labelled*);
- d) The outer packaging is of the type stated on the accompanying Dangerous Goods Transport Document and is permitted by the applicable Packing Instruction (*new requirement*);
- e) The package or overpack does not contain different dangerous goods which require segregation from each other according to Table 7-1 (*existing requirement*);
- f) The package etc is not leaking and there is no indication that its integrity has been compromised (*existing requirement*);
- g) An overpack containing packages bearing the “Cargo aircraft only” label meets the applicable requirements (*existing requirement*);

1.4 The current structure of 7;1.1 is unusual in that it combines items which must be checked with the requirements pertaining to the retention of the Dangerous Goods Transport Document i.e. the fact that two copies must be provided and where they must be retained for the duration of the flight. Furthermore, the requirement for a checklist is 2 paragraphs removed in 7;1.3 and contains another aspect for checking (documentation) not mentioned in 7;1.1.1. It is suggested that paragraphs 7;1.1.1 and 7;1.3 would benefit from an editorial review.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to delete paragraph 7;1.1.1 and 7;1.3 and replace with the following:

1.1 ACCEPTANCE OF DANGEROUS GOODS BY OPERATORS

1.1.1 An operator must not accept for transport aboard an aircraft a package or overpack containing dangerous goods or a freight container containing radioactive material or a unit load device or other type

of pallet containing the dangerous goods as described in 1.3 unless it is accompanied by two copies of the dangerous goods transport document or, where permitted, by alternative documentation. One copy of the document must accompany the consignment to final destination and one copy must be retained by the operator at a location on the ground where it will be possible to obtain access to it within a reasonable period; the document must be retained at this point until the goods have arrived at final destination, after which time it may be stored elsewhere.

1.2 THE ACCEPTANCE CHECK

1.2.1 An operator must not accept for transport aboard an aircraft a package or overpack containing dangerous goods or a freight container containing radioactive material or a unit load device or other type of pallet containing dangerous goods as described in 1.3 unless the operator has, by use of a checklist, verified the following:

- a) the documentation complies with the detailed requirements specified in 5;4;
- b) the quantity of dangerous goods stated on the dangerous goods transport document is within the limits per package on a passenger or cargo aircraft as appropriate;
- c) the marking of the package, overpack or freight container accords with the details stated on the accompanying dangerous goods transport document and are clearly visible;
- d) the specification marking on the package, if applicable, is suitable for the packing group of the dangerous goods contained within;
- e) proper shipping names, UN numbers, labels and special handling instructions appearing on the interior package(s) are clearly visible or reproduced on the outside of an overpack;
- f) the labelling of the package, overpack or freight container is as required by Part 5;3;
- g) the outer packaging of a package is of the type stated on the accompanying dangerous goods transport document and is permitted by the applicable packing instruction;
- h) the package or overpack does not contain different dangerous goods which require segregation from each other according to Table 7-1;
- i) the package, overpack, freight container or unit load device is not leaking and there is no indication that its integrity has been compromised;
- j) an overpack does not contain packages bearing the “Cargo aircraft only” label unless:
 - 1) the packages are assembled in such a way that clear visibility and easy access to them is possible; or
 - 2) the packages are not required to be accessible under 7;2.4.1; or
 - 3) not more than one package is involved.

Note 1.— Minor discrepancies, such as the omission of dots and commas in the proper shipping name appearing on the transport document or on package markings, or minor variations in hazard

labels which do not affect the obvious meaning of the label, are not considered as errors if they do not compromise safety and should not be considered as reason for rejecting a consignment.

Note 2.— Where packages are contained in an overpack or freight container, as permitted by 1.3, the checklist should establish the correct marking and labelling of such overpack or other type of pallet or freight container and not the individual packages contained in them. Where packages are contained in a unit load device, as permitted by 1.3.1, the checklist should not require the checking of packages individually for the correct marking and labelling.

Note 3.— An acceptance check is not required for dangerous goods in excepted quantities and radioactive material in excepted packages.

1.3 ACCEPTANCE OF FREIGHT CONTAINERS AND UNIT LOAD DEVICES

1.3.1 An operator must not accept from a shipper a freight container or a unit load device containing dangerous goods other than:

- a) A freight container for radioactive material (see 6;7.1);
- b) A unit load device or other type of pallet containing consumer commodities prepared according to Packing Instruction 910;
- c) A unit load device or other type of pallet containing dry ice used as a refrigerant for other than dangerous goods prepared according to Packing Instruction 904; or
- d) A unit load device or other type of pallet containing magnetized material.

1.3.2 When an operator accepts a unit load device or other type of pallet containing consumer commodities, dry ice or magnetized material as permitted by 1.3.1, the operator must attach an identification tag as required by 2.7.1 to the unit load device.”

Editorial Note.— It is suggested that a more logical sequence of paragraphs might be:

- 1.1 Acceptance of dangerous goods by operators
 - 1.2 The acceptance check
 - 1.3 Acceptance of freight containers and unit load devices
 - 1.4 Cargo acceptance procedures
 - 1.5 Special responsibilities in accepting infectious substances
 - 1.6 Undeliverable consignments of radioactive material
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