



**WORKING PAPER**

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

**Auckland, New Zealand, 4 to 8 May 2009**

**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 2011/2012 Edition**

**2.5: Part 5 — Shipper's Responsibilities**

**METHOD OF DESCRIBING OVERPACKS**

(Presented by D. Brennan)

**SUMMARY**

This paper proposes addition of some text into Part 5.4 of the Technical Instructions on the recommended methods for describing packages in an overpack on the dangerous goods transport document.

Action by the DGP-WG is in paragraph 22.

**1. INTRODUCTION**

1.1 At DGP-WG/08 a paper was submitted seeking the opinion of the Working Group of the Whole with respect to the appropriate method for describing how packages contained in overpacks should be described on the dangerous goods transport document (DGP-WG/08-WP/53).

1.2 There was a mixed response from the members with some members of the opinion that the provisions in the Technical Instructions were sufficiently clear and that adding prescriptive requirements may have a cost impact on shippers who may have to revise their computer systems. Other members supported the approach taken as indicated in the examples provided in DGP-WG/08-WP/53 that are presently included in the IATA Dangerous Goods Regulations (DGR).

1.3 The initial purpose for raising the issue of describing overpacks at DGP-WG/08 was because a question had been raised as to the correctness of the examples shown in the IATA DGR with respect to compliance with the requirements set out in Part 5.4.1.5.1 of the Technical Instructions with respect to the shipper indicating the number of packages on the dangerous goods transport document.

1.4 As indicated in DGP-WG/08-WP/53, the examples contained in the IATA DGR indicating methods to describe packages in overpacks have been in place since 1997. Over the intervening twelve years these examples have become custom and practice for shippers, freight forwarders, ground handling agents, airline dangerous goods acceptance staff and dangerous goods trainers. In addition, many

providers of computer systems have used these examples as a basis for developing software that will generate an industry compliant dangerous goods transport document.

1.5 Clearly the provisions contained in the Technical Instructions form the legal basis for the transport of dangerous goods by air and in this respect the completion of the dangerous goods transport document and the information provided thereon must comply with the requirements of Part 5;4. However, the presenter is not aware of any civil aviation authority inspector challenging the legality of a dangerous goods transport document completed with overpacks described as indicated in the examples contained in the IATA DGR.

1.6 It is not the intention of the presenter to contend that a document providing “industry recommendations” on the transport of dangerous goods by air should overtake the legal text, however in developing legal requirements, the practical application of the requirements should be taken into account.

1.7 On that basis it is proposed that some recommendations on acceptable methods of describing overpacks be included into Part 5, Chapter 4.

## 2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to:

a) revise 5;4.1.5.1 as follows:

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

In addition to the dangerous goods description the following information must be included after the dangerous goods description on the dangerous goods transport document.

#### 4.1.5.1 *Quantity of dangerous goods, number and type of packagings*

The number of packages, type of packaging (e.g. steel drum, fibreboard box, etc.) and net quantity of dangerous goods in each package (by volume or mass, as appropriate) must be indicated for each item of dangerous goods bearing a different proper shipping name, UN number or packing group. Where packages are contained in an overpack(s) the recommended method of describing the overpack as shown in 4.1.5.9 should be followed. Abbreviations may be used to specify the unit of measurement for the quantity. For packages containing the same dangerous goods and quantity per package a multiple of the quantity may be used. For example:

...

b) add a new paragraph 4.1.5.9 to Part 5;4 as follows:

#### 4.1.5.9 Overpacks

To facilitate easy identification of overpacks during acceptance and loading, packages contained in multiple overpacks should be described on the dangerous goods transport document as follows:

a) multiple overpacks with identical contents. The number of individual packages contained in each overpack should be identified, followed by the information required by 4.1.5.1, as applicable. This then should be followed by the statement “Overpack used x (number of identical overpacks)”. For example:

10 fibreboard boxes x 5 L  
Overpack used x 3

Total quantity per overpack 50 L

b) multiple overpacks with different contents. The number of individual packages contained in each different overpack(s) should be identified, followed by the information required by 4.1.5.1, as applicable. Each overpack containing different contents should be listed separately. For example:

10 fibreboard boxes x 5 L  
Overpack used x 3  
Total quantity per overpack 50 L

20 fibreboard boxes x 10 L  
Overpack used x 2  
Total quantity per overpack 200 L

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