



WORKING PAPER

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

Abu Dhabi, United Arab Emirates, 7 to 11 November 2010

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 2013/2014 Edition

2.4: Part 4 — Packing Instructions

PACKING INSTRUCTION 954 — “DESCRIPTION OF THE GOODS”

(Presented by D. Brennan)

SUMMARY

This paper proposes the removal of text from Packing Instruction 954 that would appear to require a description of the goods being shipped, in addition to the information related to carbon dioxide, solid.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 Packing Instruction 954 addresses the packing requirement for UN 1845, Carbon dioxide, solid (dry ice), which is widely used as a refrigerant for non-dangerous goods such as frozen seafood, frozen meat, etc.

1.2 When used as a refrigerant for non-dangerous goods the documentation requirements of Part 5;4 do not apply provided that the shipper supplies alternative documentation describing the contents. The information required on this alternative documentation is the UN number, proper shipping name, number of packages and net quantity of dry ice in each package.

1.3 However Packing Instruction 954 then goes on in subparagraph e) under additional packing requirements to require that “the information must be included with the description of the goods.” This statement is being taken by some parties to require that the shipper must also provide a description of the goods being refrigerated, e.g. “frozen fish”, “meat”, etc., and the absence of the description of the goods is a violation.

1.4 While there may be a requirement for a description of the goods to be provided for Customs or commercial purposes, there does not appear to be any safety reason that the description of the goods must be shown. In researching the history of the this text, it was identified that the language was adopted at DGP/18 to address the information requirements where no dangerous goods transport document is required and to standardise the location of where on the alternative documentation, such as an air waybill the required information must appear. This came about in response to difficulties in locating information as part of an accident investigation.

1.5 It is proposed that for dry ice this level of specificity is not required and the text should be deleted.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to revise Packing Instruction 954 as follows:

Packing Instruction 954		
Passenger and cargo aircraft for UN 1845 only		
General requirements		
Part 4, Chapter 1 requirements must be met, including:		
1) Compatibility requirements		
— Substances must be compatible with their packagings as required by 4;1.1.3.		
2) Closure requirements		
— Closures must meet the requirements of 4;1.1.4.		
<i>UN number and proper shipping name</i>	<i>Quantity — passenger</i>	<i>Quantity — cargo</i>
UN 1845 Carbon dioxide, solid or Dry ice	200 kg	200 kg
ADDITIONAL PACKING REQUIREMENTS		
In packages:		
a) must be packed in accordance with the general packing requirements of 4;1 and be in packaging designed and constructed to permit the release of carbon dioxide gas to prevent a build-up of pressure that could rupture the packaging;		
b) the shipper must make arrangements with the operator(s) for each shipment, to ensure that ventilation safety procedures are followed;		

c) the dangerous goods transport document requirements of 5.4 are not applicable provided alternative written documentation is provided describing the contents. Where an agreement exists with the operator, the shipper may provide the information by electronic data processing (EDP) or electronic data interchange (EDI) techniques. The information required is as follows and should be shown in the following order:

1) UN 1845;

2) **Carbon dioxide, solid** or **Dry ice**;

3) the number of packages and the net quantity of dry ice in each package; and

d) the net mass of the **Carbon dioxide, solid** or **Dry ice** must be marked on the outside of the package; ~~and~~

~~e) the information must be included with the description of the goods.~~

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— END —