



WORKING PAPER

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

Montreal 15 – 19 April 2013

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 2015/2016 Edition

2.7: Part 7 — Operator's Responsibilities

STOWAGE OF TOXIC AND INFECTIOUS SUBSTANCES

(Presented by D. Brennan)

SUMMARY

This working paper proposes removal of the requirement for toxic and infectious substances to be segregation from live animals and foodstuffs.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 At DGP-WG/12 a working paper was submitted (DGP-WG/12-WP/20) proposing revisions to Part 7;2.9 which sets out the requirements for the stowage of toxic and infectious substances.

1.2 There was some support for the intent of the proposal, but not for the text proposed. In the discussion of the working paper there was an indication that perhaps these segregation requirements were no longer necessary.

1.3 Since then there has been some consideration of the requirements set out in Part 7;2.9 and what these requirements mean in practice. Part 7;2.9 requires that packages bearing a Class 6 hazard label must be segregated from animals and packages that are marked or “known” to contain foodstuffs.

1.4 The basis for this requirement is derived from requirements that were in place in US domestic regulations dating back to at least 1975 when they were brought in to the IATA Restricted Articles Regulations of that year. These requirements also formed part of the text of the initial edition of the Technical Instructions.

1.5 While the segregation requirements appear to have merit, there is some question as to their real practical safety value. To start there is no prohibition on the loading of substances in Class 6 with items that are not “known” to contain foodstuffs, so there could be packages where the shipper has not indicated that the contents are items of foodstuffs and as a consequence the operator would not apply any loading restrictions.

1.6 These segregation requirements also do not apply to passenger baggage, so packages containing substances in Class 6 may be loaded, next to, or on top of passenger baggage. In addition there are no requirements for loading personnel to have to wear personal protective equipment when handling packages bearing a Class 6 hazard label, and there are no reports of any exposure to toxic substances by contaminated passenger baggage or by loading personnel.

1.7 In looking at the requirements for packagings and the packing instructions there have been significant changes since the segregation requirements were introduced into IATA Restricted Articles Regulations in 1975 and the Technical Instructions in 1984. At that time these requirements came into the Technical Instructions, the provisions for packagings and package testing were only just in place. In addition, the packing instructions contained far less detail than is now in place in the Instructions.

1.8 Looking at the provisions in Chapter 7 of the UN Recommendations there are significant differences to those in Part 7;2.9. The UN Recommendations have no segregation requirement for infectious substances. The provisions of Part 7;2.9 only apply to UN 2814 and UN 2900. These are infectious substances in Category A which must be in packagings that conform to Packing Instruction 620, which is a triple packaging that must be tested with a drop test height of 9 metres. These are very robust packagings and as a consequence we believe that infectious substances should be deleted from Part 7;2.9.

1.9 For Division 6.1, the UN Recommendations make allowance for the segregation requirements to be relaxed for substances in Packing Group II and III provided the competent authority is satisfied that the packing and segregation are adequate to prevent contamination.

1.10 For air transport, unlike the other modes of transport, there is a requirement for operators to perform an acceptance check of dangerous goods consignments offered for transport. This acceptance includes a physical check of packages and overpacks to ensure that the packagings are free from damage.

1.11 This check to confirm that packagings are free from damage or leakage then extends through to the loading and unloading process, in and out of unit load devices, or for bulk loaded cargo, in and out of the aircraft.

1.12 Part 7;3.3 sets out the requirements for an operator to inspect packages and overpacks, which includes specific requirements in the event of leakage or contamination.

1.13 Based on these requirements it is proposed to delete Part 7;2.9 in its entirety.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to amend Part 7, Chapter 2 to delete paragraph 2.9 and then to renumber all subsequent paragraphs. If this is not supported it is proposed to remove the requirement for infectious substances in Category A from Part 7;2.9 as shown in the appendix of this working paper.

APPENDIX

PROPOSED AMENDMENT TO PART 7 OF THE TECHNICAL INSTRUCTIONS

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PART 7

OPERATOR'S RESPONSIBILITIES

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Chapter 2

STORAGE AND LOADING

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Proposal 1

~~2.9 STOWAGE OF TOXIC AND INFECTIOUS SUBSTANCES~~

~~Substances of Class 6 (toxic and category A infectious substances) and substances requiring a subsidiary risk "Toxic" label must not be carried in the same compartment of an aircraft with animals, substances marked as or known to be foodstuffs, feeds or other edible substances intended for consumption by humans or by animals, unless either the toxic or category A infectious substances and the foodstuffs or animals are loaded in separate unit load devices and when stowed aboard the aircraft the unit load devices are not adjacent to each other, or the toxic or category A infectious substances are loaded in one closed unit load device and the foodstuffs or animals are loaded in another closed unit load device.~~

2.409 SPECIAL PROVISIONS APPLICABLE TO THE CARRIAGE OF RADIOACTIVE MATERIAL

2.409.1 Limitation of exposure of persons to radiation

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Proposal 2

2.9 STOWAGE OF TOXIC AND INFECTIOUS SUBSTANCES

~~Substances of Class 6 (toxic and category A infectious substances)~~ **Division 6.1** and substances requiring a subsidiary risk "Toxic" label must not be carried in the same compartment of an aircraft with animals, substances marked as or known to be foodstuffs, feeds or other edible substances intended for consumption by humans or by animals, unless either the toxic or category A infectious substances and the foodstuffs or animals are loaded in separate unit load devices and when stowed aboard the aircraft the unit load devices are not adjacent to each other, or the toxic or category A infectious substances are loaded in one closed unit load device and the foodstuffs or animals are loaded in another closed unit load device.

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