



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

Rio de Janeiro, Brazil, 20 to 24 October 2014

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 2017-2018 Edition

2.7: Part 7 — Operator's Responsibilities

“OTHER TYPE OF PALLET”

(Presented by D. Brennan)

REVISED

SUMMARY

This working proposes the removal of text that refers to acceptance of dangerous goods on “other type of pallet”.

Action by the DGP-WG: The DGP-WG is invited to amend the Technical Instructions as shown in the appendix to this working paper.

1. INTRODUCTION

1.1 In Part 7, Chapter 1 there are a number of references to “other type of pallet” with respect to the acceptance of dangerous goods by the operator. This phrase appears to identify in addition to dangerous goods being presented for transport in a package, overpack, or unit load device they may also be presented in or on an “other type of pallet”. However, it is questioned as to just what this “other type of pallet” could be that is not already addressed by the previous descriptions.

1.2 The Technical Instructions contain a definition for “package”, which is the standard requirement for dangerous goods to be acceptable for air transport, although there is an allowance for some dangerous goods, such as vehicles to be transported unpackaged. A package or multiple packages may be assembled into an “overpack”, which is defined. Then there are specific allowances made for limited types of dangerous goods, such as dry ice and consumer commodities (in packages) to be presented to the operator in a “unit load device”, which is defined.

1.3 In considering what is meant by “other type of pallet”, there are devices that are widely used in transport such as wooden skids or pallets that allow the use of a forklift to move goods around without the goods on the skid or pallet being damaged. However, looking at the definitions packages placed on these wooden skids or pallets would be considered to be an overpack.

1.4 It is suggested therefore that the additional text “or other type of pallet” in Part 7;1.2.1, 7;1.3.1, Note 2 under 7;1.3.1 and 7;1.4 is redundant and should be deleted. If this position is supported then there will be a need to make consequential amendments to Special Provisions A70, A151 and Packing Instructions 954 and Y963 where the phrase “or other type of pallet” has been introduced to allow shippers to place dangerous goods onto these devices for acceptance by the operator.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to amend the Technical Instructions as shown in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENTS TO THE TECHNICAL INSTRUCTIONS

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Part 7

OPERATOR'S RESPONSIBILITIES

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Chapter 1

ACCEPTANCE PROCEDURES

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1.2 ACCEPTANCE OF DANGEROUS GOODS BY OPERATORS

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 the dangerous goods as described in 1.4.1 b) and c) unless:

- a) it is accompanied by two copies of the dangerous goods transport document; or
- b) the information applicable to the consignment is provided in electronic form; or
- c) it is accompanied, where permitted, by alternative documentation.

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1.3 THE ACCEPTANCE CHECK

1.3.1 Before a consignment consisting of a package or overpack containing dangerous goods, a freight container containing radioactive material or a unit load device ~~or other type of pallet~~ containing dangerous goods as described in 1.4 is first accepted for carriage by air, the operator must, by use of a checklist, verify the following:

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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 1.4, the checklist should establish the correct marking and labelling of such an 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 1.4.1, the checklist should not require the checking of packages individually for the correct marking and labelling.

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1.4 ACCEPTANCE OF FREIGHT CONTAINERS AND UNIT LOAD DEVICES

1.4.1 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 Y963;
- 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 954; or
- d) a unit load device ~~or other type of pallet~~ containing magnetized material.

1.4.2 When an operator accepts a unit load device ~~or other type of pallet~~ containing consumer commodities or dry ice as permitted by 1.4.1, the operator must attach an identification tag as required by 2.8.1 to the unit load device.

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Consequential changes:

Part 3

DANGEROUS GOODS LIST, SPECIAL PROVISIONS AND LIMITED AND EXCEPTED QUANTITIES

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Chapter 3

SPECIAL PROVISIONS

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Table 3-2. Special provisions

<i>TIs</i>	<i>UN</i>
...	
A70	Internal combustion or fuel cell engines being shipped either separately or incorporated into a vehicle, machine or other apparatus, without batteries or other dangerous goods, are not subject to these Instructions when carried as cargo provided that:
...	
	Multiple engines may be shipped in a unit load device or other type of pallet provided that the shipper has made prior arrangements with the operator(s) for each shipment.
	When this special provision is used, the words "not restricted" and the special provision number A70 must be provided on the air waybill when an air waybill is issued.
...	
A151	When dry ice is used as a refrigerant for other than dangerous goods loaded in a unit load device or other type of pallet , the quantity limits per package shown in columns 11 and 13 of Table 3-1 for dry ice do not apply. In such case, the unit load device or other type of pallet must be identified to the operator and must allow the venting of the carbon dioxide gas to prevent a dangerous build-up of pressure.
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Part 4**PACKING INSTRUCTIONS**

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Chapter 11**CLASS 9 — MISCELLANEOUS DANGEROUS GOODS**

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Packing Instruction 954

Passenger and cargo aircraft for UN 1845 only

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Dry ice used for other than dangerous goods may be shipped in a unit load device ~~or other type of pallet~~ prepared by a single shipper provided that:

- a) the shipper has made prior arrangements with the operator;
- b) the unit load device, ~~or other type of pallet~~, must allow the venting of the carbon dioxide gas to prevent a dangerous build-up of pressure (the marking requirements of 5;2 and the labelling requirements of 5;3 do not apply to the unit load device); and
- c) the shipper must provide the operator with written documentation or, where agreed with the operator, information by EDP or EDI techniques, stating the total quantity of the dry ice contained in the unit load device ~~or other type of pallet~~.

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Packing Instruction Y963

Passenger and cargo aircraft for ID 8000 only

Consumer commodities are materials that are packaged and distributed in a form intended or suitable for retail sale for the purposes of personal care or household use. These include items administered or sold to patients by doctors or medical administrations. Except as otherwise provided below, dangerous goods packed in accordance with this packing instruction do not need to comply with 4;1 or Part 6 of these Instructions; they must, however, comply with all other applicable requirements.

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- k) Consumer commodities shipped according to these provisions may be shipped in a unit load device ~~or other type of pallet~~ prepared by a single shipper provided they contain no other dangerous goods. The shipper must provide the operator with written documentation stating the number of packages of consumer commodities contained in each unit load device ~~or other type of pallet~~.

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Part 7

OPERATOR'S RESPONSIBILITIES

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Chapter 2

STORAGE AND LOADING

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2.11 LOADING OF DRY ICE

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2.11.2 Where dry ice is contained in a unit load device ~~or other type of pallet~~ prepared by a single shipper in accordance with Packing Instruction 954 and the operator, after acceptance, adds additional dry ice, then the operator must ensure that the information provided to the pilot-in-command reflects that revised quantity of dry ice.

Note.— For arrangements between the shipper and operator see Packing Instruction 954.

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Chapter 4

PROVISION OF INFORMATION

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4.1 INFORMATION TO THE PILOT-IN-COMMAND

4.1.1 As early as practicable before departure of the aircraft, but in no case later than when the aircraft moves under its own power, the operator of an aircraft in which dangerous goods are to be carried must:

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4.1.1.1 Except as otherwise provided, the information required by 4.1.1 must include the following:

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- f) the net quantity, or gross mass if applicable, of each package, except that this does not apply to radioactive material or other dangerous goods where the net quantity or gross mass is not required on the dangerous goods transport document (see 5;4.1.4) or, when applicable, alternative written documentation. For a consignment consisting of multiple packages containing dangerous goods bearing the same proper shipping name and UN number or ID number, only the total quantity and an indication of the quantity of the largest and smallest package at each loading location need to be provided. For unit load devices ~~or other types of pallets~~ containing consumer commodities accepted from a single shipper, the number of packages and the average gross mass need to be provided;

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4.11 RETENTION OF DOCUMENTS OR INFORMATION

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4.11.2 For each package or overpack containing dangerous goods or freight container containing radioactive material or unit load device ~~or other type of pallet~~ containing dangerous goods as described in 1.4 that was not accepted by an operator due to an error or omission by the shipper in packaging, labelling, marking or documentation, a copy of the documentation as well as the acceptance checklist (when this is in a form which requires physical completion) should be retained for a minimum period of three months after the completion of the acceptance checklist.

Note.— Where the documents are kept electronically or in a computer system, they should be capable of being reproduced in a printed manner.

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