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COMMITTEE OF EXPERTS ON THE TRANSPORT OF  
DANGEROUS GOODS AND ON THE GLOBALLY  
HARMONIZED SYSTEM OF CLASSIFICATION  
AND LABELLING OF CHEMICALS

Sub-Committee of Experts on the  
Transport of Dangerous Goods  
(Twenty-second session, 2-6 December 2002  
agenda item 9)

ANY OTHER BUSINESS

Sequence of the dangerous goods description  
on the transport document

Transmitted by the International Air Transport Association (IATA)

This IATA position paper was presented on 19 September 2002 to the International Civil Aviation Organization (ICAO) Dangerous Goods Panel Working Group, which met in Frankfurt on 16-20 September 2002. IATA was invited by the ICAO Dangerous Goods Working Group to present this paper to the Sub-Committee.

Background

The Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals adopted in the 12<sup>th</sup> revised edition of the Orange book two alternative sequences for the dangerous goods description to be entered on the transport document as follows:

***Sequence one:***

UN number, Proper shipping name (PSN), Class/division, Packing group

Example: UN 1717, Acetyl Alcohol, 3, PG II

States having a strong ADR/RID representation at the Committee favoured this sequence, as this aligned with the recently adopted ADR/RID provisions.

***Sequence two***

Proper shipping name (PSN), Class/division, UN number, packing group

Example: Acetyl Alcohol, 3, UN 1717, PG II

This sequence was favoured by the air mode and mostly non-European States satisfied with the current UN sequence.

The Committee had also agreed earlier that any assigned subsidiary hazard must be entered after the main hazard. In the above example, as acetyl alcohol has a subsidiary class 8 hazard, the information must be presented as follows:

***Sequence one:*** UN 1717, acetyl Alcohol, 3 (8), PG II, or

***Sequence two:*** Acetyl Alcohol, 3 (8), UN 1717, PG II

This latest change automatically negates the advantages of the second sequence, as this means the current sequence used by the air mode is not aligned with any of the above two recommended alternatives.

***Current sequence*** Acetyl Alcohol, 3, UN 1717, PG II, 8

The ICAO Dangerous Goods Panel (DGP) agreed at DGP 18, held in Montreal in October 2001 to align with the UN recommendations. It also agreed to allow the continued use of the current sequence of information until December 31, 2004 thus providing a two years transition period from Jan 1, 2003 to December 31, 2004 for the change to be implemented. Practically, this means that the following alternatives/example will be acceptable during this transition period:

- (a) UN 1717, acetyl Alcohol, 3 (8), PG II, or,
- (b) Acetyl Alcohol, 3 (8), UN 1717, PG II, or
- (c) Acetyl Alcohol, 3, UN 1717, PG II, 8

The ICAO DGP also agreed that on 1 January 2005, alternative/example (c) above would no longer be acceptable.

## **Discussion**

The discussion at the Committee and Sub-Committee meetings had centred on the issue of harmonisation and the need for all modes to follow the same sequence (see DGP 18, WG 01, min 2.1.7). The Committee revised the sequence of information on the transport document with the goal of enhancing safety, lower costs to industry and facilitate trade by harmonising and standardising the presentation of information on the Dangerous Goods Transport Document across the modes. In emergency situations, when time is of the essence, standardisation leads to faster response time, easier retrieval of critical information and, minimises the possibilities of error. It is considered that by offering a choice of alternative sequences the above goals are not met.

DGP 18 discussed this issue and agreed (see DGP 18 report, 2.4.6.3.3.(c)) “*that the longer term goal should be to have a single sequence*”. It was also agreed to advise the Sub-Committee of the Panel position on this.

At its 80<sup>th</sup> and 81<sup>st</sup> meetings held in April and August of this year, the IATA Dangerous Goods Board (DGB) discussed the UN decision at length. The DGB considered that the adoption of a single sequence of information was a high priority for the air carrier industry. Whereas other modes may have the flexibility to accommodate multiple sequence, for safety, operational and training requirements, the air mode does not have this flexibility. The IATA DG experts recognised that a transitional period from one sequence to the other was inevitable, however it was preferable if this was as short as possible.

In consequence, the IATA DGB decided to publish in the 2003 IATA Dangerous Goods Publication the air carrier intention that from January 1, 2005 only a single sequence (UN number, Proper shipping name (PSN), Class/division, Packing group) of information would be accepted.

This decision is aligned with the fact that the ICAO Technical Instructions permit both States and Operators to impose requirements that are more restrictive. The IATA Dangerous Goods Board considers that by standardising with the preferred ADR sequence, it would facilitate the transition to the new scheme.

The Sub-Committee is invited to take note of this decision.

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