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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

Thirtieth session
Geneva, 4-12 (a.m.) December 2006
Item 2(a) of the provisional agenda

**PROPOSALS OF AMENDMENTS TO THE RECOMMENDATIONS
ON THE TRANSPORT OF DANGEROUS GOODS**

Assembly of Packages by Freight Forwarders

Transmitted by the International Air Transport Association (IATA)

Referenced documents from the twenty-ninth session:

ST/SG/AC.10/C.3/2006/18

UN/SCETDG/29/INF.31

UN/SCETDG/29/INF.8

Background

1. At the twenty-ninth session, there was discussion on proposed amendments to the definition and application of overpacks put forward by FIATA (ST/SG/AC.10/C.3/2006/18). Informal document UN/SCETDG/29/INF 8, submitted by IATA, raised some concerns about the FIATA proposals and subsequently there was no adoption of the FIATA proposals.
2. The FIATA paper did identify that there are operational issues for freight forwarders in being able to combine multiple packages from one or more consignors for ease of handling. During the discussion, an intervention by a member of the delegation from

Belgium indicated that the IMDG Code had addressed at least part of the issue with the inclusion of a definition of “unit load” and instructions in Chapter 5.1 of Volume 1 of the Code regarding the use of overpacks and unit loads. This approach may offer a way forward.

3. Based on suggestions from a number of delegations, discussion has taken place intersessionally between IATA and FIATA to consider the broader issues and ways that these can be addressed within the Model Regulations. These discussions have looked at the role of the freight forwarder in dangerous goods transport and consideration of formally recognising the freight forwarder in the transport regulations as well as the operational aspects of how packages are handled and loaded into transport units or conveyances.
4. Freight forwarders play an important role in facilitating the movement of cargo, including dangerous goods, by all modes of transport. They act on behalf of the consignor by providing services such as: negotiating and arranging transportation of cargo, generating commercial transport documentation, such as air waybills, arranging or providing warehousing, etc. Where the freight forwarder generates the dangerous goods transport document described in Chapter 5.4, then the freight forwarder becomes a “consignor”, as defined.
5. Despite this activity, the Model Regulations do not recognise or identify the existence of freight forwarders. The ICAO Technical Instructions incorporated a definition of ‘freight forwarder’ into the 2005-2006 edition, but this was done only to more clearly specify the application of dangerous goods training requirements for persons who handle dangerous goods being transported by air.

Proposal 1

It is proposed to add the following definitions in 1.2.1:

“Freight forwarder means a person or organization who provides services that relate to the transport (by any means), consolidation, storage, handling or distribution of dangerous goods and non-dangerous goods.

Unit load means an enclosure used to contain one or more packages to form one unit for convenience of handling and stowage during transport, but does not include an overpack.

Examples of unit loads are a number of packages:

- (a) placed or stacked on to a load board such as a pallet and secured by strapping, shrink wrapping, stretch wrapping, or other suitable means;
- (b) placed in a protective outer packaging such as a box or crate;
- (c) permanently secured together in a sling;
- (d) placed in an aircraft container or aircraft pallet.”

Proposal 2

It is proposed to revise the marking requirements for overpacks, set out in 5.1.2.1, to make the marking of an overpack mandatory. In this way an overpack will not be confused with a unit load. The proposed text would read as follows:

“5.1.2.1 An overpack shall be marked with the word “OVERPACK”. Unless the marks and labels that identify each of the dangerous goods in the overpack are visible through the overpack, the overpack shall have displayed on it the proper shipping name, the UN Number and the label, required by Chapter 5.2, for each of the dangerous goods contained in the overpack.”

Proposal 3

It is proposed that the consignor be required to identify on the dangerous goods transport document when an overpack is used. This requirement would serve to clearly identify what is being presented for transport. The text would be added as a new 5.4.1.5.9, as follows:

“5.4.1.5.9 *Overpacks*

When an overpack is used, the words “OVERPACK USED” shall be inserted on the dangerous goods transport document in a manner that will clearly and immediately identify those dangerous goods that are contained in the overpack.”

Proposal 4

The last step is to introduce requirements that define what a freight forwarder may do when assembling a unit load. It is proposed that this should be reflected in a new 7.1.1.10 as follows:

“7.1.1.10 A freight forwarder may create a unit load provided that:

- (a) packages are placed in a unit load in accordance with the segregation requirements of 7.1.2; and
- (b) the marks and labels of each of the dangerous goods in the unit load are visible. Where this cannot be achieved, the freight forwarder shall display on the outside of the unit load enclosure the proper shipping name, the UN number and the label, in accordance with the requirements in Chapter 5.2, for each of the dangerous goods contained in the unit load; or
- (c) the unit load is appropriately marked, labelled and placarded.

NOTE: Modal regulations or carrier requirements may apply restrictions on the type and/or quantity of dangerous goods that may be placed in a unit load.”
