



International Civil Aviation Organization

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English only

WORKING PAPER

DANGEROUS GOODS PANEL (DGP)

TWENTY-SECOND MEETING

Montréal, 5 to 16 October 2009

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 2011-2012 Edition

CHANGE OF WORDING TO PREVENT THE DENIAL OF SHIPMENTS OF RADIOACTIVE MATERIAL

(Presented by D.Raadgers.)

SUMMARY

This paper proposes an amendment to the optional requirement of adding the telephone number of consignees for shipments of Class 7 goods.

Action by the DGP: The DGP is invited to amend the additional wording proposed at DGP-WG08 in Part 5;4.1.3 of the Technical Instructions as shown in the appendix:

1. INTRODUCTION

1.1 During the 2008 meeting of the DGP Working Group of the Whole (DGP-WG08, The Hague, 3 to 7 November 2008) a proposal to add the telephone number of the consignee for radioactive material/Class 7 shipments on the dangerous goods transport document was made (DGP-WG08-WP/68, paragraph 3.2.34 refers). Following an amendment to make this requirement optional, the proposal was accepted and incorporated as follows:

4.1.3 Shipper and consignee

The name and address of the shipper and the consignee of the dangerous goods must be included on the dangerous goods transport document. For the transport of radioactive material, the telephone number of the consignee, in the State of Destination, should be included.

1.2 Although the wording “should” identifies an optional requirement in the Technical Instructions, daily experience has revealed that in non-native English speaking States “should” is often seen as a mandatory requirement, especially after translation.

1.3 Therefore it is believed that the use of the wording "should be included" will lead to more denials of Shipments of radioactive material at the airport in the State of Departure, if the telephone number is not mentioned on the dangerous goods transport document, even though this is not a mandatory requirement. Especially with the shipments of radioactive pharmaceuticals, which consists of 'short-lived' radio isotopes, these denials can jeopardize patient treatments worldwide due to misinterpretation of the wording "should".

1.4 Taking into account that the reason for this addition of the consignee's phone number was not air-safety related but was introduced solely to facilitate a smooth transfer to the consignee of the radioactive material at the airport of destination, different wording to describe this optional requirement is proposed in the appendix.

1.5 The proposed description of the optional requirement to add the consignees telephone number for shipments of radioactive material will provide the needed clarity and can indeed facilitate a smoother distribution of radioactive material from the start to the end: No denials nor delays at the Airport of Departure due to misinterpretation of the wording "should" and consignors can include consignee's telephone number on the Dangerous goods Transport Document that may benefit the quick release of the consignment at the Airport of Destination.

APPENDIX

PROPOSED AMENDMENT TO THE TECHNICAL INSTRUCTIONS

Part 5

SHIPPER'S RESPONSIBILITIES

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Chapter 4

DOCUMENTATION

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4.1.3 Shipper and consignee

The name and address of the shipper and the consignee of the dangerous goods must be included on the dangerous goods transport document. For the transport of radioactive material, the telephone number of the consignee may be included to facilitate a prompt release at the airport of destination.

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