



WORKING PAPER

DANGEROUS GOODS PANEL (DGP)

TWENTY-NINTH MEETING

Montréal, 13 to 17 November 2023

Agenda Item 2: Managing air-specific safety risks and identifying anomalies (*Ref: REC A DGS 2025*)

2.2: Develop proposals, if necessary, for amendments to the Technical Instructions for the *Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2025-2026 Edition

REMOVAL OF THE NEED FOR THE NAME OF THE SHIPPER AND CONSIGNEE ON PACKAGES PREPARED IN ACCORDANCE WITH PACKING INSTRUCTION 650

(Presented by D. Brennan)

SUMMARY

This working paper proposes a revision to Packing Instruction 650 to remove the mandatory requirement for the name of the shipper and consignee to be marked on the package.

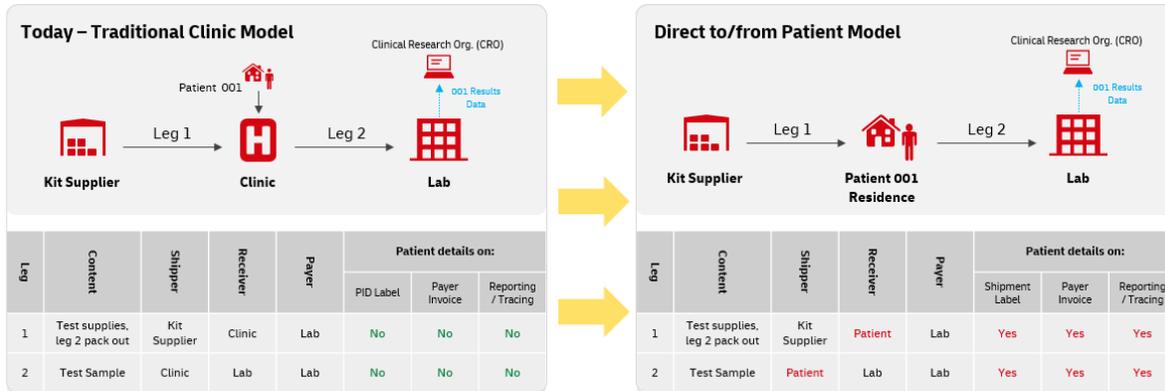
Action by the DGP: The DGP is invited to consider revising Packing Instruction 650 to make the marking of the name and address of the shipper and consignee optional as shown in the appendix to this working paper.

1. INTRODUCTION

1.1 Digitalization is increasingly transforming industries, including, music, retail, and transport. Online solutions for patients in the life science and healthcare industry is relatively new, but direct to patient shipping is expected to increase by 300 per cent in the next four years.¹

¹ "Life Sciences and Healthcare Predictions 2022", Deloitte.

Clinical Trials Site vs future Direct to / from Patient Model



1.2 In order to support direct to/from patient, there are key requirements:

- a) to support trial integrity (blind), the patient details (name/address) cannot be shared with the laboratory;
- b) patient confidentiality remains a consideration that is only likely to get tighter; and
- c) to avoid exposing patient details, shippers will need to suppress their name, address, phone number on the package marks.

1.3 In most logistics environments (both cargo and integrators), operators and freight forwarders rely on shipment identifier (alphanumeric code, barcode, QR code, etc.) that keeps all the data elements of shipper and consignee. Information on the package, and on physical documents, when, used, is no longer consulted for actual delivery and sign off. Often names and addresses are only used if such shipment identifier has been damaged and is a secondary (i.e. back up means of identification).

1.4 However, the Technical Instructions requires that packages prepared in accordance with Packing Instruction 650 must bear marks identifying the name and address of the shipper and consignee, although no such marks are required by the UN Model Regulations, and consequently other modes of transport.

1.5 If the contents of the package are classified as “exempt human specimens” in accordance with Part 2;6.3.2.3.8, then there is no requirement for the package to be marked with the name and address of the shipper and consignee, which suggests that for UN 3373 — **Biological substance, Category B** and Packing Instruction 650, the requirement may be related to facilitation and is not safety critical.

1.6 On that basis it is proposed to revise the requirements for information marked on packages prepared in accordance with Packing Instruction 650 to make the application of the name and address of the shipper and consignee optional.

2. **ACTION BY THE DGP**

2.1 The DGP is invited to consider revising Packing Instruction 650 to make the marking of the name and address of the shipper and consignee optional as shown in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENT TO PACKING INSTRUCTION 650 OF THE TECHNICAL
INSTRUCTIONS

Part 4

PACKING INSTRUCTIONS

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Chapter 8

CLASS 6 — TOXIC AND INFECTIOUS SUBSTANCES

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Packing Instruction 650

This packing instruction applies to UN 3373.

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- 11) Infectious substances assigned to UN 3373 which are packed and marked in accordance with this packing instruction are not subject to any other requirement in these Instructions except for the following:
- a) the name and address of the shipper and of the consignee must be provided on each package. The information may be applied through the use of a barcode, QR code or other equivalent means;
 - b) the name and telephone number of a person responsible must be provided on a written document (such as an air waybill) or on the package;
 - c) classification must be in accordance with 2;6.3.2;
 - d) the incident reporting requirements in 7;4.4 and 7;4.5 must be met;
 - e) the inspection for damage or leakage requirements in 7;3.1.3 and 7;3.1.4; and
 - f) passengers and crew members are prohibited from transporting infectious substances either as, or in, carry-on baggage or checked baggage or on their person.

Note.— When the shipper or consignee is also the “person responsible” as referred to in b), the name and address need be marked only once in order to satisfy the name and marking provisions in both a) and b).

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