# DANGEROUS GOODS PANEL (DGP) WORKING GROUP MEETING (DGP-WG/15)

### Montreal, 27 April to 1 May 2015

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

2.4: Part 4 — Packing Instructions

#### **PACKING INSTRUCTION 650**

(Presented by R. McLachlan)

#### **SUMMARY**

This working paper proposes a review of the requirement in Packing Instruction 650 for the name and telephone number of a person responsible to be provided on a written document or on the package for UN 3373.

**Action by the DGP-WG:** The DGP is invited to consider removal of the requirement as shown in the appendix to this working paper.

### 1. **INTRODUCTION**

- 1.1 Paragraph 11) b) of Packing Instruction 650, which applies to UN 3373, **Biological** substance, Category B, requires that "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".
- 1.2 Although formal acceptance checks required by Part 7;1 of the Technical Instructions do not apply to consignments in compliance with Packing Instruction 650, there have been occasions when such packages have been refused carriage either because the package or the accompanying documentation is missing the name and telephone number of a responsible person, or because there is some other problem with that information; one example being because a generic job title has been supplied rather than the name of a person.

- 1.3 Whilst such rejections are technically correct, it is questioned whether it is really essential that the name and telephone number of a responsible person be provided for such consignments, particularly since the equivalent packing instruction (650) in the United Nations Recommendations on the Transport of Dangerous Goods does not require this information.
- 1.4 The requirement for the name and telephone number of a responsible person to be provided was introduced into Packing Instruction 650 in the 2005-2006 Edition of the Technical Instructions when the Packing Instruction was significantly revised to take account of what was then a major change in the way infectious substances were classified and transported. Since the responsible person information is required for UN 2814 and UN 2900, it was felt appropriate at the time to include the same requirement for UN 3373.
- 1.5 These provisions have now been in place for ten years, so it is suggested that it is an appropriate time to consider whether the additional requirement compared with that of the United Nations Recommendations on the Transport of Dangerous Goods is still necessary or justified.

#### 2. **ACTION BY THE DGP-WG**

- 2.1 The DGP-WG is invited to consider whether retention of the requirement for the name and telephone number of a responsible person to be provided in accordance with Packing Instruction 650, paragraph 11) b) is necessary.
- 2.2 If it is determined that the requirement is not essential, it is proposed that paragraph 11) b) of Packing Instruction 650 be deleted and the subsequent sub-paragraphs renumbered accordingly. As a consequence. It is also proposed that the Note below paragraph 11 also be deleted since it would become unnecessary.

#### **APPENDIX**

### PROPOSED AMENDMENT TO PART 4 OF THE TECHNICAL INSTRUCTIONS

## Part 4

# **PACKING INSTRUCTIONS**

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# **Chapter 8**

# **CLASS 6 — TOXIC AND INFECTIOUS SUBSTANCES**

#### 8.1 PACKING INSTRUCTIONS

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# Packing Instruction 650

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- 10) When packages are placed in an overpack, the package markings required by this packing instruction must either be clearly visible or the markings must be reproduced on the outside of the overpack and the overpack must be marked with the word "Overpack".
- 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;
- 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;
  - eb) classification must be in accordance with 2;6.3.2;
  - dc) the incident reporting requirements in 7;4.4 must be met;
  - ed) the inspection for damage or leakage requirements in 7;3.1.3 and 7;3.1.4; and
  - fe) 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).

12) Clear instructions on filling and closing such packages must be provided to the shipper or to the person who prepares the package (e.g. patient) by packaging manufacturers and subsequent distributors to enable the package to be correctly prepared for transport.

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