

DANGEROUS GOODS PANEL

Dubai, 31 March to 4 April 2003

Agenda Item 2: Development of recommendations for amendments to the Technical Instructions for incorporation in the 2005/2006 edition

AIR ELIGIBILITY MARKING

(Presented by R. Richard)

1. INTRODUCTION

1.1 The 2003-2004 Edition of the Technical Instructions includes a new air eligibility package marking that was intended to enhance safety by requiring consignors to certify that dangerous goods packages meet the applicable air transport requirements. This was considered necessary to heighten awareness of air transport requirements since they are generally more restrictive than requirements that apply for other modes of transport. The following is the text that now appears in the TI relative to the air eligibility mark:

2.4.12 Air eligibility marking

From 1 January 2004, packagings, including those used for limited quantities of dangerous goods, must be marked to indicate that the shipper has determined that the packaging meets the applicable air transport requirements. The marking must be applied as prescribed in 2.2 and must be placed adjacent to the markings prescribed in 2.4.1, or for limited quantity packagings, adjacent to the marking prescribed in 2.4.10. The marking must be durable, legible and of such a size relative to the packaging as to be readily visible. The marking must include the symbol consisting of an aircraft within a circle as shown below and may include the words "Air Eligible".

1.2 Since the text was adopted, there has been time to consider it further and to exchange views with consignors and carriers. On the basis of discussions with persons that are directly affected by this new provision, it has become apparent that some people misunderstand the meaning and applicability of the mark. One of the problems appears to be the use of the word "packaging". According to 1;3.1.1 of the Technical Instructions packaging means: "Receptacles and any other components or materials necessary for the receptacle to perform its containment function." In retrospect the use of the term "package" which means: "The complete product of the packing operation, consisting of the packaging and its contents prepared for transport" would have been more appropriate and resulted in less confusion.

1.3 In addition to confusion with regard to whether the new mark refers to packagings or packages, there has also been misunderstanding regarding what is meant by the words "the applicable air transport requirements." To alleviate potential confusion it is proposed that 5;2.4.12 be amended to clearly indicate the meaning of the mark. Panel members are requested to consider amending the Technical Instructions to more

clearly indicate that the air eligibility mark is intended to apply to all aspects of a package's compliance with the air transport requirements including classification of the contents, marking, labelling, and packaging requirements. This would be more consistent with the connotation the mark conveys (i.e. Air Eligible). A truly air eligible package conforms in all respects to the requirements of the Technical Instructions.

2. PROPOSAL

2.1 It is proposed that 5;2.4.12 be revised as follows:

~~From 1 January 2004, packagings,~~ **Packages**, including those used for limited quantities of dangerous goods, must be marked to indicate that the shipper has determined that they ~~packaging~~ meets the applicable air transport requirements. **The mark is a certification by the shipper that a package conforms to the requirements of these Technical Instructions in all respects, and is confirmation that its contents are properly classified, it is properly marked and labelled, and it conforms to all relevant packaging provisions and packing instructions including those pertaining to quantity limitations, closures, pressure differential, and use of absorbent materials.** The marking must be applied as prescribed in 2.2 and must be placed adjacent to the markings prescribed in 2.4.1, or for limited quantity packagings, adjacent to the marking prescribed in 2.4.10. The marking must be durable, legible and of such a size relative to the ~~packaging~~ as to be readily visible. The marking must include the symbol consisting of an aircraft within a circle as shown below and may include the words "Air Eligible".

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