



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/18)**

Montréal, 1 to 5 October 2018

- Agenda Item 3: Managing safety risks posed by the carriage of lithium batteries by air**
3.6: Develop provisions aimed at improving compliance throughout the transport supply chain, including simplification of provisions, guidance on State oversight and outreach, and responsibilities of entities outside the aviation stream (Job card DGP.003.02)

REPORTING REQUIREMENTS FOR UN 3245, UN 3373 AND SECTION II LITHIUM BATTERIES

(Presented by D. Brennan)

SUMMARY

This working paper proposes revisions to Packing Instructions 650 and 959 and Section II of Packing Instructions 965 to 970 to align the reporting requirements to those for all other dangerous goods.

Action by the DGP-WG: The DGP-WG is invited to consider the revisions to the packing instructions as shown in the appendix to this working paper.

1. INTRODUCTION

1.1 Reporting of dangerous goods accidents and incidents and reporting of undeclared or misdeclared dangerous goods are key elements in the Technical Instructions as these reports identify to operators and regulators potential weaknesses in the controls around the transport of dangerous goods.

1.2 However, in some parts of the Technical Instructions, where there is an allowance to permit the preparation and carriage of dangerous goods without having to apply all relevant provisions, not all of the reporting requirements have been referenced as being applicable. In particular those that apply to reporting of undeclared and misdeclared dangerous goods in Part 7;4.5.

1.3 While it is appropriate to simplify the provisions that apply for certain dangerous goods, such as UN 3373, Biological substances, Category B and Section II lithium batteries, it is believed that to

ensure that the adequacy of the provisions and compliance with the provisions that all the reporting provisions of Part 7, Chapter 4 must apply.

1.4 To address this gap, it is proposed to revise Packing Instructions 650 and 959 and Section II of Packing Instructions 965 to 970 to include reference to Part 7;4.5 to ensure that where these dangerous goods are identified in transport without being prepared and offered as required by the provisions of the applicable packing instruction that a report is submitted to the authorities of the State of the Operator and the State in which the event occurred.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to revise Packing Instructions 650 and 959 and Section II of Packing Instructions 965 to 970 as shown in the appendix to this working paper.

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

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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;
- 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;

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Chapter 11

CLASS 9 — MISCELLANEOUS DANGEROUS GOODS

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Packing Instruction 959

Passenger and cargo aircraft for UN 3245 only

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GMOs or GMMOs assigned to UN 3245 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:

- 1) the name and address of the shipper and of the consignee must be provided on each package;
- 2) classification must be in accordance with 2;9.2.1 c);
- 3) the incident reporting requirements in 7;4.4 **and 7;4.5** must be met;
- 4) the inspection for damage or leakage requirements in 7;3.1.3 and 7;3.1.4;
- 5) passengers and crew members are prohibited from transporting UN 3245 either as, or in, carry-on baggage or checked baggage or on their person.

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Packing Instruction 965

Cargo aircraft only for UN 3480

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II. SECTION II

Lithium ion cells and batteries, when complying with Section II of this packing instruction, are only subject to the following additional provisions of these Instructions:

- Part 1;2.3 (General — Transport of dangerous goods by post);
- Part 5;1.1 g) and j) (Shipper's responsibilities — General requirements);
- Part 7;2.1 (Operator's responsibilities — Loading restrictions on the flight deck and for passenger aircraft);
- Part 7;2.4.1 (Operator's responsibilities — Loading of cargo aircraft);
- Part 7;4.4 (Operator's responsibilities — Reporting of dangerous goods accidents and incidents);
- **Part 7;4.5 (Operator's responsibilities — Reporting of undeclared and misdeclared dangerous goods);**
- Part 8;1.1 (Provisions concerning passengers and crew — Dangerous goods carried by passengers or crew); and
- Paragraphs 1 and 2 of this packing instruction.

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Packing Instruction 966

Passenger and cargo aircraft for UN 3481 (packed with equipment) only

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II. SECTION II

Lithium ion cells and batteries, when complying with Section II of this packing instruction, are only subject to the following additional provisions of these Instructions:

- Part 1;2.3 (General — Transport of dangerous goods by post);
- Part 7;4.4 (Operator's responsibilities — Reporting of dangerous goods accidents and incidents);
- ~~Part 7;4.5 (Operator's responsibilities — Reporting of undeclared and misdeclared dangerous goods);~~
- Part 8;1.1 (Provisions concerning passengers and crew — Dangerous goods carried by passengers or crew); and
- Paragraphs 1 and 2 of this packing instruction.

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Packing Instruction 967

Passenger and cargo aircraft for UN 3481 (contained in equipment) only

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II. SECTION II

Lithium ion cells and batteries, when complying with Section II of this packing instruction, are only subject to the following additional provisions of these Instructions:

- Part 1;2.3 (General — Transport of dangerous goods by post);
- Part 7;4.4 (Operator's responsibilities — Reporting of dangerous goods accidents and incidents);
- ~~Part 7;4.5 (Operator's responsibilities — Reporting of undeclared and misdeclared dangerous goods);~~
- Part 8;1.1 (Provisions concerning passengers and crew — Dangerous goods carried by passengers or crew); and
- Paragraphs 1 and 2 of this packing instruction.

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Packing Instruction 968

Cargo aircraft only for UN 3090

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II. SECTION II

Lithium metal or lithium alloy cells and batteries, when complying with Section II of this packing instruction, are only subject to the following additional provisions of these Instructions:

- Part 1;2.3 (General — Transport of dangerous goods by post);
- Part 5;1.1 g) and j) (Shipper's responsibilities — General requirements);
- Part 7;2.1 (Operator's responsibilities — Loading restrictions on the flight deck and for passenger aircraft);
- Part 7;2.4.1 (Operator's responsibilities — Loading of cargo aircraft);
- Part 7;4.4 (Operator's responsibilities — Reporting of dangerous goods accidents and incidents);
- ~~Part 7;4.5 (Operator's responsibilities — Reporting of undeclared and misdeclared dangerous goods);~~
- Part 8;1.1 (Provisions concerning passengers and crew — Dangerous goods carried by passengers or crew); and
- Paragraphs 1 and 2 of this packing instruction.

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Packing Instruction 969

Passenger and cargo aircraft for UN 3091 (packed with equipment) only

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II. SECTION II

Lithium metal or lithium alloy cells and batteries, when complying with Section II of this packing instruction, are only subject to the following additional provisions of these Instructions:

- Part 1;2.3 (General — Transport of dangerous goods by post);
- Part 7;4.4 (Operator's responsibilities — Reporting of dangerous goods accidents and incidents);
- ~~Part 7;4.5 (Operator's responsibilities — Reporting of undeclared and misdeclared dangerous goods);~~
- Part 8;1.1 (Provisions concerning passengers and crew — Dangerous goods carried by passengers or crew); and
- Paragraphs 1 and 2 of this packing instruction.

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Packing Instruction 970

Passenger and cargo aircraft for UN 3481 (contained in equipment) only

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II. SECTION II

Lithium metal or lithium alloy cells and batteries, when complying with Section II of this packing instruction, are only subject to the following additional provisions of these Instructions:

- Part 1;2.3 (General — Transport of dangerous goods by post);
- Part 7;4.4 (Operator's responsibilities — Reporting of dangerous goods accidents and incidents);
- ~~Part 7;4.5 (Operator's responsibilities — Reporting of undeclared and misdeclared dangerous goods);~~
- Part 8;1.1 (Provisions concerning passengers and crew — Dangerous goods carried by passengers or crew); and
- Paragraphs 1 and 2 of this packing instruction.

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