



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/19)**

Montréal, 1 to 5 April 2019

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)

AIR WAYBILL STATEMENT FOR SECTION II CONSIGNMENTS

(Presented by D. Brennan)

SUMMARY

This working paper proposes that where there are packages of Section II lithium batteries across more than one packing instruction that the compliance statement on the air waybill can be combined into a single compliance statement that identifies the applicable lithium battery type(s) and packing instruction numbers.

Action by the DGP-WG: The DGP-WG is invited to consider the text proposed for inclusion in the lithium battery packing instructions as shown in the appendices to this working paper.

1. INTRODUCTION

1.1 Section II of the lithium battery packing instructions requires that when an air waybill is used the air waybill must include a compliance statement that includes the type of lithium cells or batteries, i.e. lithium ion or lithium metal, the words “in compliance with Section II” and the applicable packing instruction, e.g. Packing Instruction 965. For example, in Section II of Packing Instruction 966 the applicable statement is “Lithium ion batteries in compliance with Section II of Packing Instruction 966”.

1.2 Where there are multiple consignments from a single shipper and there are different battery types or packing instructions and these are described on one air waybill or where a freight forwarder consolidates multiple consignments that have different compliance statements, these are being shown separately on the air waybill, see some examples in Appendix B.

1.3 Questions have been raised by shippers, freight forwarders, ground handling agents and operators if it is possible to combine multiple statements for different battery types / packing instructions into a single statement that includes the elements of the statement.

1.4 The benefit of permitting a single statement is that when transmitted as an e-air waybill using Cargo Interline Message Protocol (IMP) there is a limited number of characters that can be included within the defined fields. Having to include multiple compliance statements uses a large number of characters without improving safety. Even where a paper air waybill is used, the need to repeat the compliance statement simply reduces the available “real estate” on the air waybill for other information related to the shipment.

1.5 It is therefore proposed to make allowance for the compliance statements to be combined into a single statement on the air waybill to identify the applicable lithium battery types and the relevant packing instruction numbers, for example “Lithium ion and lithium metal batteries in compliance with PI 967 and 970”. This would be added into Section II of the packing instructions by way of a note to identify that when this applies the statement may be in form shown.

2. ACTION BY THE DGP-WG

2.1 The DGP is invited to consider adding notes into Section II of Packing Instructions 965 to 970 to make allowance for a single compliance statement that includes multiple packing instructions as shown in the appendix to this working paper.

— — — — —

APPENDIX A

PROPOSED AMENDMENT TO PART 4 OF THE TECHNICAL INSTRUCTIONS

Part 4

PACKING INSTRUCTIONS

...

Chapter 11

CLASS 9 — MISCELLANEOUS DANGEROUS GOODS

...

Packing Instruction 965

Cargo aircraft only for UN 3480

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:

...

II.2 Additional requirements

...

- The words “lithium ion batteries, in compliance with Section II of PI965” — cargo aircraft only” or “lithium ion batteries, in compliance with Section II of PI965 — CAO” must be placed on the air waybill, when an air waybill is used.

Note.— Where packages of Section II lithium batteries from multiple packing instructions are included on one air waybill, the compliance statement for the different lithium battery types or packing instructions may be combined into a single statement, e.g. Lithium ion and metal batteries in compliance with Section II of PI 965 and 968 — CAO.

- Packages and overpacks of lithium ion batteries prepared in accordance with the provisions of Section II must be offered to the operator separately from cargo which is not subject to these Instructions and must not be loaded into a unit load device before being offered to the operator.
- Any person preparing or offering cells or batteries for transport must receive adequate instruction on these requirements commensurate with their responsibilities.

...

Packing Instruction 966

...

II. SECTION II

...

II.2 Additional requirements

- The words “lithium ion batteries, in compliance with Section II of PI966” must be placed on the air waybill, when an air waybill is used.

Note.— Where packages of Section II lithium batteries from multiple packing instructions are included on one air waybill, the compliance statement for the different lithium battery types or packing instructions may be combined into a single statement, e.g. Lithium ion and metal batteries in compliance with Section II of PI966 and 970.

- Where a package contains a combination of lithium batteries contained in equipment and lithium batteries packed with equipment that meet the limits for lithium cells or batteries of Section II, the following additional requirements apply:

...

Packing Instruction 967

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

...

II. SECTION II

...

II.2 Additional requirements

- Where a consignment includes packages bearing the lithium battery mark, the words “lithium ion batteries, in compliance with Section II of PI967” must be placed on the air waybill, when an air waybill is used.

Note.— Where packages of Section II lithium batteries from multiple packing instructions are included on one air waybill, the compliance statement for the different lithium battery types or packing instructions may be combined into a single statement, e.g. Lithium ion and metal batteries in compliance with Section II of PI966 and 970.

- Any person preparing or offering cells or batteries for transport must receive adequate instruction on these requirements commensurate with their responsibilities.

...

Packing Instruction 968

Cargo aircraft only for UN 3090

...

II. SECTION II

...

II.2 Additional requirements

...

- The words "lithium metal batteries, in compliance with Section II of PI968 — cargo aircraft only" or "lithium metal batteries, in compliance with Section II of PI968 — CAO" must be placed on the air waybill, when an air waybill is used.

Note.— Where packages of Section II lithium batteries from multiple packing instructions are included on one air waybill, the compliance statement for the different lithium battery types or packing instructions may be combined into a single statement, e.g. Lithium ion and metal batteries in compliance with Section II of PI965 and 968 — CAO.

- Packages and overpacks of lithium metal batteries prepared in accordance with the provisions of Section II must be offered to the operator separately from cargo which is not subject to these Instructions and must not be loaded into a unit load device before being offered to the operator.

...

Packing Instruction 969

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

...

II. SECTION II

...

II.2 Additional requirements

...

- The words "lithium metal batteries, in compliance with Section II of PI969" must be placed on the air waybill, when an air waybill is used.

Note.— Where packages of Section II lithium batteries from multiple packing instructions are included on one air waybill, the compliance statement for the different lithium battery types or packing instructions may be combined into a single statement, e.g. Lithium ion and metal batteries in compliance with Section II of PI966 and 969.

- Where a package contains a combination of lithium batteries contained in equipment and lithium batteries packed with equipment that meet the limits for lithium cells or batteries of Section II, the following additional requirements apply:

...

Packing Instruction 970

Passenger and cargo aircraft for UN 3091 (contained in equipment) only

...

II. SECTION II

...

II.2 Additional requirements

- Where a consignment includes packages bearing the lithium battery mark, the words “lithium metal batteries, in compliance with Section II of PI970” must be placed on the air waybill, when an air waybill is used.

Note.— Where packages of Section II lithium batteries from multiple packing instructions are included on one air waybill, the compliance statement for the different lithium battery types or packing instructions may be combined into a single statement, e.g. Lithium ion and metal batteries in compliance with Section II of PI966 and 970.

- Any person preparing or offering cells or batteries for transport must receive adequate instruction on these requirements commensurate with their responsibilities.

...

— — — — —

APPENDIX B AIR WAYBILL

Agent's IATA Code [REDACTED]		Account No. [REDACTED]													
Airport of Departure (Addr. of First Carrier) and Requested Routing HONG KONG								Reference Number				Optional Shipping Information			
To SIN	By First Carrier CX	Routing and Destination		to	by	to	by	Currency HKD	CHAS Code	WT/AL gpd X	Other gpd X	Declared Value for Carriage [REDACTED]		Declared Value for Customs [REDACTED]	
Airport of Destination SINGAPORE		Flight/Date CX079/17		For Carrier Use Only		Flight/Date		Amount of Insurance XXX		INSURANCE - If Carrier offers insurance and such insurance is requested in accordance with conditions on reverse hereof indicate amount to be insured in figures in box marked "Amount of Insurance."					
Handling Information SPX/EAW/ELI/ELM														SCI	
No. of Pieces RCP	Gross Weight	kg lb	Rate Class Commodity Item No.	Chargeable Weight	Rate Charge	Total	Nature and Quantity of Goods (incl. Dimensions or Volume)								
104	[REDACTED]	K	Q	[REDACTED]	[REDACTED]	[REDACTED]	CONSOL LITHIUM ION BATTERIES IN COMPLIANCE WITH SECTION II OF PI967 LITHIUM METAL BATTERIES IN COMPLIANCE WITH SECTION II OF PI970								

— END —