

**COMMITTEE OF EXPERTS ON THE TRANSPORT OF  
DANGEROUS GOODS AND ON THE GLOBALLY  
HARMONIZED SYSTEM OF CLASSIFICATION  
AND LABELLING OF CHEMICALS**

**Sub-Committee of Experts on the  
Transport of Dangerous Goods**

**(Twenty-third session, 30 juin-4 July 2003**

**Agenda item 13)**

**OTHER BUSINESS**

*The secretariat reproduces hereafter a letter received from the International Air Transport Association (IATA) to Mr. J. Capel Ferrer, Director of the UNECE Transport Division, regarding the sequence of information on the Shipper's Declaration of Dangerous Goods (Refer to ST/SG/AC.10/C.3/44, paras. 65-69).*

March 7, 2003

Mr. José Capel Ferrer  
Director, Transport Division  
United Nations  
Economic Commission for Europe  
Palais des Nations  
CH-1211 Geneva 10  
Switzerland

Dear Mr. Ferrer:

I refer to your letter of February 19, 2003 bringing forward the concerns of the United Nations Economic and Social Council's Sub-Committee of Experts on the Transport of Dangerous Goods with respect to IATA's sequence of information on the Shipper's Declaration of Dangerous Goods.

Historically, IATA has aligned with the single sequence of information specified in the first edition of the ICAO Technical Instructions, promulgated in 1983. In addition, IATA has ensured to align the Shipper's Declaration of Dangerous Goods with UN Recommendations Dangerous Goods Transport Document while incorporating operational modal requirements. This demonstrates that IATA fully endorses standardisation and seeks to implement to the fullest extent possible, the provisions of the ICAO Technical Instructions and the UN Model Regulations. I note that the introductory note to Part 7 of the ICAO Technical Instructions, specifying Operator Responsibilities, specifically states that operators may impose special requirements on the transport of particular articles or substances.

The reasons for the decision on the sequence of information taken by IATA's Dangerous Goods Board at its September 2001 meeting were two-fold:

1. IATA members view a standard and single sequence to be important for safety reasons. A standard single sequence ensures accurate and rapid comprehension of the dangerous goods identification.
2. A single sequence greatly simplifies transport operations. As the only mode which specifically carries out a checklist, administering and training for a dual sequence format will inevitably delay air shipments and place a disproportionate financial burden on carriers.

The IATA Dangerous Goods Board took the opportunity to review your comments in detail at its recent meeting in Montreal (DGB/82 held from February 25 to 27, 2003). Members noted that, although not reflected in the report of the 22<sup>nd</sup> Session, the three industry carrier organisations represented at the meeting spoke in strong support of a single sequence. One, the IRU indicated that his organisation had reviewed the dual sequence and had in fact chosen the opposite sequence to the one IATA had opted for!

The issue of standardisation of dangerous goods regulatory compliance procedures remains a considerable problem for industry. We note in the 2003/2004 ICAO Technical Instructions, that some 27 States have filed some 136 variations to ICAO. Many of those variations require industry to adopt specific procedures or, place additional requirements over and above those detailed in the UN model regulations and the ICAO Technical Instructions. Adding more complexity to the Regulations does not help the industry as it encourages more carriers to refuse dangerous goods altogether, which usually results in an increase in the frequency of undeclared dangerous goods shipments. These kinds of shipments are well documented as being the number one safety hazard for the air mode.

It is the IATA Dangerous Goods Board's understanding from your letter, from the report of the Sub-committee's meeting and from discussion with several competent authorities, that the single sequence, as indicated in the 44<sup>th</sup> edition of the IATA Dangerous Goods Regulations, will be acceptable if the implementation period were delayed to 2007. This will provide the industry more time to adapt its current practice. Accordingly, the IATA Dangerous Goods Board agreed the delay implementation of the single sequence to 2007. The 45<sup>th</sup> edition of the Dangerous Goods Regulations will reflect this change. I would like to take this opportunity to reiterate IATA's full commitment to the consultation process in decision affecting the Industry.

I hope you will find this satisfactory.

Yours sincerely,

Giovanni Bisignani  
Director General

c.c. S. Benassai, Chairman of the Sub-Committee  
F. Wybenga, Vice-chairman of the Sub-Committee

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