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**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-fifth session, 5-14 July 2004
Item 7 of the provisional agenda

**MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS
ON THE TRANSPORT OF DANGEROUS GOODS**

Proposal to amend Chapter 5.4, Section 5.4.1, Multimodal Dangerous Goods Form

Submitted by the International Vessel Operators Hazardous Materials Association, Inc. (VOHMA)

Background

1. The 13th revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations (ST/SG/AC.10/1/Rev.13, Vol. II), Chapter 5.4, Figure 5.4.1 illustrates an example of a MULTIMODAL DANGEROUS GOODS FORM, which may be used as a combined dangerous goods declaration and container packing certificate for multimodal transport of dangerous goods. This form includes reference to PASSENGER AND CARGO AIRCRAFT in box #8 and flight number in box #10.
2. The International Civil Aviation Organization (ICAO) Doc. 9284-AN/905 has not adopted any prescribed form for the shipper's declaration for dangerous goods. However, the International Air Transport Association (IATA) the standard setting organization for accepting dangerous goods for air transportation internationally, does not authorize the use of this form for air transport in the IATA Dangerous Goods Regulations. They require use of the form specified at 8.1.1 of the IATA regulations. Thus, the reference to aircraft and flight numbers is not applicable to the modes currently utilizing the recommended form.
3. The superfluous entries applicable to air carriage confuse many of those responsible for preparation of these declarations or for the extrapolation from those entries on the document, the critical information required to ensure compliance with other regulatory requirements such as marking and placarding of freight containers.

4. The design placement of the shippers declaration between boxes #7 and #8 is not located in proximity to box #22 where the shipper signs the certification statement.
5. The RECEIVING ORGANIZATION RECEIPT may have had some basis for inclusion, however it is very seldom signed due to the fact that most freight containers or international consignments are sealed to prevent access during transport. The carrier's (haulier's) driver can not be required to accept liability for the condition of the freight in such a sealed unit without actually observing the contents of the cargo transport unit.
6. The ADR at 5.4.4 includes the identical recommended form with the addition of hatchings on the border. The International Maritime Dangerous Goods Code (IMDG) at 5.4.5.1, has included the Model Regulations recommended form at Figure 5.4.1. While 5.4.1.2 of the Code states that there is no mandatory format for the transport document, some governmental authorities, having adopted the IMDG Code by reference in national regulations, and now accept only this form for dangerous goods consignments for transport by vessel within their jurisdiction. However, many shippers and carriers who offer or transport dangerous goods by vessel or by interlining transport by highway or rail do not use the form which is currently recommended since their employees are often confused by the extraneous information mentioned above. Container shipments may be delayed or frustrated when the recommended form has not been presented. VOHMA previously submitted a proposal to the 7th Session of the IMO Sub-committee on Dangerous Goods, Solid Cargoes and Containers (DSC 7/3/14) inviting the sub-committee to consider reformatting the Multi-modal Dangerous Goods Form and introducing an amended form. Several delegations expressed support for the proposal, however it was suggested that VOHMA first present the proposal for consideration by the UN Committee of Experts on the Transportation of Dangerous Goods for the benefit of continuing harmonization.
7. Simplification of the recommended form to include only relevant data would promote safety while not impairing the functional efficiency of the document. A recommended intermodal shipping document should include only such information as needed for accurately booking, transporting and describing dangerous goods in a paper document or an electronically transmitted document that could be used for highway, rail and vessel transport and intermodal transfers in international commerce.

Proposal

8. VOHMA proposes that Figure 5.4.1, recommended format for the MULTIMODAL DANGEROUS GOODS FORM be amended and reformatted to eliminate superfluous entries regarding shipments of dangerous goods by aircraft, adding fields for data entry that are beneficial to intermodal carriers, and repositioning of required fields for data entry, all for the purpose of eliminating confusion and enhancing safety in intermodal transportation.

Action requested of the Sub-Committee

9. The Sub-Committee is invited to consider the annexed draft MULTIMODAL DANGEROUS GOODS FORM as the recommended form at Figure 5.4.1 and to take action as appropriate.

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(Proposed Figure 5.4.1) MULTIMODAL DANGEROUS GOODS FORM

Shipper/Consignor/Sender of Record		Transport document number -		
		Page of pages	Shipper's reference	
		Booking No.	Freight Forwarder's reference	
Consignee		Carrier (to be completed by carrier)		
Vessel Name and voyage		Emergency contact telephone (with international access code)		
Place of receipt		Additional handling information:		
Port/place of loading				
Port/place of discharge		Placards/Signs:		
Place of final destination				
Shipping marks	No. and kind of packages	Description of goods (UN No., PSN, Class, PG)	Gross mass (kg)	Net Explosive Qty (Class 1 only)
<p>Use and attach continuation sheet(s) if necessary</p>				
Container identification No./ vehicle registration No.	Seal number(s)	Container/vehicle size & type	Tare mass (kg)	Total gross including tare (kg)
<p>CONTAINER/VEHICLE PACKING CERTIFICATE</p> <p>It is declared that the packing of the goods into the container/vehicle identified above has been carried out in accordance with the applicable provisions.</p> <p>MUST BE COMPLETED AND SIGNED FOR ALL CONTAINER/VEHICLE LOADS (other than tanks) BY THE PERSON RESPONSIBLE FOR PACKING/LOADING PER 5.4.2.1.</p>		<p>SHIPPER'S DECLARATION</p> <p>I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labelled/placarded and are in all respects in proper condition for transport according to the applicable international and national governmental regulations.</p> <p>MUST BE COMPLETED AND SIGNED FOR ALL DANGEROUS GOODS CONSIGNMENTS BY THE PERSON RESPONSIBLE FOR OFFERING THE DANGEROUS GOODS FOR TRANSPORT PER 5.4.1.6</p>		
Name of company packing container		Name of company of shipper		
Name/status of declarant		Name/status of declarant		
Place container/vehicle packed		Place and date		
Date packed:				
Signature of declarant		Signature of declarant		

Dangerous Goods Declaration Continuation Sheet

Shipper/Consignor/Sender of Record		Transport document number -		
		Page of pages	Shipper's reference	
		Booking No.	Freight Forwarder's reference	
Consignee		Carrier (to be completed by carrier)		
Shipping marks	No. and kind of packages	Description of goods (UN No., PSN, Class, PG)	Gross mass (kg)	Net Explosive Qty (Class 1 only)
<p><i>Use and attach additional continuation sheet(s) if necessary</i></p>				


