

Thanks to Sian Goddard, BADGP Committee Member, from Gatehouse Consultancy and Training Limited for bringing this to our attention.

Please find below information regarding the issues that have arisen when shipping vehicles/engines and lithium batteries to the USA. I would advise that you inform all of your customers who may be affected by this problem to prevent shipments being rejected. Please do not hesitate to contact us for further guidance.

1. Purpose.

The objective of this bulletin is to notify the network of certain limitations for the transportation of some dangerous goods to/from/thru the US.

2. Background.

The new US administration directed DOT to withdraw the Final Rule (HM-215N) that would have harmonised the US domestic dangerous goods regulations, 49 CFR, with the new international regulations set out in the 19th revised edition of the UN Model Regulations, IMDG Code and 2017-2018 edition of the ICAO Technical Instructions.

The purpose of the harmonisation rulemaking is to formally bring into 49 CFR the new provisions that have been agreed by the international bodies and which now apply to the transport of dangerous goods by air with effect 1 January 2017. These include the new UN numbers for engines and the new entries for machinery (UN 3528, UN 3529 and UN 3530), the new lithium battery mark and the new lithium battery Class 9 hazard label.

By not implementing the Final Rule all of the new provisions that are set out in the 2017–2018 Technical Instructions and 58th edition of the DGR are not brought into 49 CFR. The effect of this that for dangerous goods shipped to, from, through or within the US the provisions that remain in effect are those set out in the 2015-2016 edition of the Technical Instructions and in the 57th edition of the DGR. This means that effectively the new UN numbers, lithium battery mark and Lithium battery Class 9 label do not exist in the US regulations, and therefore cannot be used

4. For Action.

(a) Until further notice, the following requirements of the IATA DGR, 58th Edition **must NOT** be used for carriage by air to/from/thru the US:

- UN3528
- UN3529
- UN3530
- Class 9 Lithium Battery label (Fig. 7.3.X)
- Lithium Battery mark (Fig. 7.1.C)

(b) Until further notice, engines to/from/thru the US **must be** shipped under UN3166 (as required in the 57th edition).

(c) Until further notice, the Class 9 label (Fig. 7.3.W) and/or the Lithium Battery label (Fig. 7.4.H), as/where appropriate, **must be** used for consignments to/from/thru the US (as required in the 57th edition).