

ICC Regulatory Guide: EXPECTED CHANGES FOR IATA DGR 2025



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Dangerous Goods Regulations (DGR) Edition 66

The guide recognized by the world's airlines



WHAT'S EXPECTED FOR IATA DGR 2025?

As we move into the second half of 2024, shippers of dangerous goods should be getting prepared for the new United Nations biennium. What's that? The UN updates their model regulations, the UN Recommendations on the Transport of Dangerous Goods, on a regular two-year basis, and January 1, 2025, will be the start of a new cycle. If you ship by air, that means that you will have to be prepared for some significant updates, and if you don't, your shipment may get left behind as non-compliant.

Fortunately, the governing body for commercial air carriers, the International Air Transport Association (IATA) has given us a preview of anticipated changes in the IATA Dangerous Goods Regulations (DGR) Appendix H. So, let's take a look at what will likely be changed for next year. Note, of course, that these are proposed changes – IATA can decide to drop some controversial plans or add new changes before the final printing. However, it's likely that the following changes will be put into the 2025 edition of the DGR as they appear here.



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NEW SHIPPING DESCRIPTIONS

Turning to the List of Dangerous Goods, we see a significant number of new descriptions. These are forecast to be:

- UN0514, **Fire suppressant dispersing devices**, Class 1.4S
- UN3559, **Fire suppressant dispersing devices**, Class 9
- UN3554, **Gallium in manufactured articles**, Class 8
- UN3551, **Sodium ion batteries**, Class 9
- UN3552, **Sodium ion batteries contained in equipment**, Class 9
- UN3552, **Sodium ion batteries packed with equipment**, Class 9
- UN3560, **Tetramethylammonium hydroxide, aqueous solution** with 25% or more tetramethylammonium hydroxide, Class 6.1(8)
- UN1835, **Tetramethylammonium hydroxide, aqueous solution** with 2% or less tetramethylammonium hydroxide, Class 8
- UN3555, **Tetrafluoromethyltetrazole sodium salt in acetone**, with 68% or more acetone, by weight, Class 3
- UN3556, **Vehicle, lithium ion battery powered**, Class 9
- UN3557, **Vehicle, lithium metal battery powered**, Class 9
- UN3558, **Vehicle, Sodium ion battery powered**, Class 9

The biggest impact is likely to be from the creation of a new entry for Sodium ion batteries, a new technology which will be treated like lithium ion batteries. Another long-awaited change is the creation of new descriptions for vehicles powered by lithium (and now, sodium ion) batteries. These vehicles have much more complex emergency response needs than those with other battery types, so having them specifically identified only makes sense.



SPECIAL PROVISIONS

Special provisions allow the DGR to apply rules to specific products, and shippers should never ignore them. Many special provisions have been revised in the List of Dangerous Goods, and some new ones created. Changes include:

- Methods for dealing with RFID tags containing lithium batteries will be added to SP123 and nickel metal hydride batteries to A199.
- A226 will be added for Detonators, electric.
- A227 will be added to give exemptions for Sodium ion batteries contained in equipment.
- A228 will be added for classification of sodium ion batteries containing acidic or alkaline electrolyte.
- A229 will be added to give relief for small packages of nitrocellulose membrane filters.
- A231 will be added for vehicles powered by sodium ion batteries.
- A232 will be added to clarify the classification of fire suppressant dispersing devices between Class 1.4S and Class 9.
- A233 will be added to clarify the classification of Tetramethylammonium hydroxide solutions in water.
- A234 will be added to indicate that for some substances, provisions of the DGR in the 2024 edition may be used through the next biennium until December 31, 2026.

OTHER CLASSIFICATION CHANGES

There will be some new guidance on:

- Definition of metal powders;
- How to assign packing groups to solids that may cause fire through friction; and
- Guidance that Monkeypox virus should henceforth be classified in Category A only for cultures, and Category B if not cultured.

The exemption from having to be placed in Class 9 that was earlier given specifically to Covid vaccines containing GMMOs or GMOs has been extended to “Pharmaceutical products, such as vaccines” in general if they contain GMMOs or GMOs.

In Appendix C.2, “Currently Assigned Substances – Organic Peroxides,” a number of new formulations have been added to keep up with new products on the market.



PACKAGING CHANGES

No major overhaul of packaging standards are foreseen for the 2025 DGR. However, there are some small changes that might have an impact on specific products. These include:

- Clarification will be added to Packing Instruction 650 regarding what it means that the receptacle must be able to withstand a pressure of 95 kPa.
- For UN 2028, Bombs, smoke, non-explosive, the packing instruction will restrict packaging to those rated for no lower than packing group II.
- For UN specification drums, there will no longer be a requirement to have two separate hoops for drums exceeding 60 Litres.
- For fibreboard used in boxes, the ISO standard will be updated to the 2014 edition from the 1991 edition.
- Multiple ISO standards for gases will be updated to more recent versions, and some new ones added.
- The definition of “recycled plastics” will be amended to include such plastics when used to manufacturer IBCs and addresses required quality control programs. Reference will be made to ISO 16103:2005 “Packaging–Transport packages for dangerous goods–Recycled plastic material”.

HAZARD COMMUNICATION

There are not a lot of changes to Section 7, Marks and Labels, and Section 8, Documentation for this new cycle. The main changes are that sodium ion batteries can use the Class 9 Lithium Battery Label (to be renamed just the Battery Label), and the Lithium Battery Mark (to be renamed the Battery Mark.)

Also, in Section 8, a note will be added that note will be added that Until 31 March 2025, shippers may identify vehicles powered by lithium batteries as, UN 3171, Battery powered vehicle as shown in the 2024 Edition of the DGR. The marks and labels applied, when required, must be consistent with the information shown on the Shipper's Declaration.



SODIUM ION BATTERIES

Sodium-ion batteries are an upcoming technology that provides batteries with most of the benefits of lithium ion batteries (such as rechargeability) but at a lower production cost. IATA has proposed three new packing instructions for these batteries, to match those for lithium ion batteries. These will break the batteries into two levels – Section I or IA for cells over 20 Wh or batteries over 100 Wh, with Section IB or II for cells and batteries that do not exceed these limits. In general, the instructions will follow the layout and requirements of those for lithium ion batteries.

WHAT SHOULD YOU DO ABOUT THE NEW IATA RULES?

Unlike some of the sweeping changes we've seen in previous UN biennial cycles, the upcoming cycle will have mostly incremental changes. But remember, unless IATA specifically notes otherwise, all these changes will apply on January 1, 2025. You won't have time to think about them on New Year's Day, so get started now reviewing how these changes will affect your shipments next year. And don't forget to pre-order your copy of the 2025 edition of the DGR so you can see the final version well in advance of the 2025 deadline.



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THANK YOU!

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