



The Importance of Using Current Dangerous Goods Regulations

As all of us involved are well aware, the transportation industry is subject to a dizzying multitude of regulations. Not only do we need to be concerned with our own federal, state and local regulations, but international transportation also requires compliance with international laws. Adding to the complexity are the frequent regulatory changes that occur, which can add strain to one's ability to remain on top of current requirements.

Fortunately, most authorities strive to harmonize national requirements with international standards in order to facilitate trade and transportation, as is the case with the regulations governing the transportation of dangerous goods. In the United States, the Pipeline and Hazardous Materials Safety Administration of the U.S. DOT participates in many international meetings and forums with the goal of harmonization, and also authorizes use of the international transport standards and regulations, such as the ICAO Technical Instructions and the IMDG Code, within a few specific limitations.

Many new requirements were introduced this year alone, including new UN numbers for Engines, the addition and deletion of Packing Instructions and Special Provisions, and evolving requirements and restrictions on the transport of lithium batteries, among others.

What we need to ensure is that the regulations we are referencing are the current ones, as change is the one constant that can be relied upon when it comes to regulations. Preparing and offering a dangerous goods shipment according to outdated requirements can result in shipment delays or even violations.

So how is this best accomplished? First of all, there is just no way around the importance of using the most current editions of the applicable regulations – when they become effective. Don't wait until, for example, your recurrent training to obtain the current edition – regulations come into force the date of their effectiveness, not the date of your training. The expense of ensuring you have the most current regulations in hand is a small investment toward getting your shipment safely and compliantly from Point A to Point B, which is the whole point of the exercise to begin with!

If you are using hard-copy publications of, for example, the IATA DGR or the IMDG Code, check regularly for updates or addendums at the organization's website or other industry websites such as the Bureau of Dangerous Goods', and make sure that any updates are incorporated when referencing the regulations. If you are using electronic regulations, be sure you run updates where available. Title 49 of the U.S. Code of Federal Regulations is publicly available at www.ecfr.gov, which is updated regularly as changes occur. You may also subscribe to receive the U.S. Federal Register, a daily publication of the U.S. Federal government which is used to announce new rules, proposed rules, and public guidance notices. Subscription may be obtained free of charge at www.federalregister.gov; and you may customize the notifications you choose to receive.

Finally, while it's easy for us to remind you to have and use the current regulations, it's just as important for all of us to ensure that we fully understand any new requirements or changes that occur. If you're unsure as to any regulatory requirement, utilize available resources such as your compliance staff, government agency websites and hotlines, technical support providers, and industry associations and websites, to name a few. We all have questions from time to time regarding the regulations, and that is why resources are widely available - don't be shy to use them!

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