

ICC Regulatory Guide: IATA DGR 66TH EDITION NEW RULES FOR 2025



WHAT'S COMING TO THE IATA DANGEROUS GOODS REGULATIONS FOR 2025?

Fall has arrived, and that means a lot of things. School starting. The leaves turning. And the yearly release of the new Dangerous Goods Regulations (DGR) from the International Air Transport Association (IATA). Fortunately, the early start will give us a few months to prepare for 2025 and a new set of rules for air transport.

The good news is that this year we see more of an evolution of the system rather than a revamp as we've seen in some previous years. Let's see what sort of changes we should watch out for.



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NEW SHIPPING DESCRIPTIONS

Let's start by looking at the heart of the DGR, the List of Dangerous Goods. For 2025, we see a limited number of new descriptions, but some will have significant effects, particularly on transport of batteries and battery-powered vehicles and equipment.

The new descriptions are:

- 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
- UN3553, **Disilane**, Class 2.1
- 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



SODIUM ION BATTERIES – A GAMECHANGER IN ENERGY STORAGE?

The biggest impact from these new descriptions is likely to come from the adoption of the new technology of Sodium ion batteries. These batteries are much like lithium ion batteries but have some important advantages such as lower cost and longer life cycles, so they're likely to be a growing market.

They'll be treated in the DGR much like lithium ion batteries, being broken into standalone batteries, batteries contained in equipment and batteries packed with equipment. New packing instructions have been created for each type, but will work much like lithium ion batteries, with standalones broken into Sections IA or IB, and batteries in or with equipment into Sections I or II, depending on their Watt-hour rating.

BATTERY-POWERED VEHICLES

Up until now, vehicles powered by lithium batteries have been lumped in with those powered by other types of batteries under the description UN3171, **Vehicles, battery powered**. But lithium (and now sodium-ion) batteries have unique fire hazards, requiring different firefighting methods by hazardous materials responders.

Therefore, these vehicles have been broken off into three new entries on the List of Dangerous Goods:

- UN3556, **Vehicle, lithium ion battery powered**, Class 9
- UN3557, **Vehicle, lithium metal battery powered**, Class 9
- UN3558, **Vehicle, Sodium ion battery powered**, Class 9

To give shippers of electric cars, e-bikes and other vehicles a little breathing room, this change doesn't have to be made until March 1, 2025.



OTHER CLASSIFICATION CHANGES

There will be some new guidance on:

- Definition of metal powders;
- Classification of explosives;
- How to assign packing groups to solids that may cause fire through friction; and
- Guidance that Mpox virus should henceforth be classified in Category A only for cultures, and Category B if not cultured. This will align with the U.S. provisions published by the Department of Transportation, and the UN Recommendations on the Safe Transport of Dangerous Goods.

The exemption from having to be placed in Class 9 that was earlier given specifically to Covid vaccines containing genetically modified micro-organisms (GMMOs) or genetically modified organisms (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 is 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 manufacture 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 the 2025 DGR. The main changes are that sodium ion batteries can use the Class 9 Lithium Battery Label (to be given the new, rather long-winded name the Lithium Battery and Sodium Ion Battery Label), and the Lithium Battery Mark (to be renamed the Battery Mark.)

A couple of things to watch out for with shipping documents include:

- The transition period for use of the new Shipper's Declaration for Dangerous Goods (that is, the one which no longer has the location or consignor's job title as required information) will come to an end on December 31, 2024. So, for January 1, 2025 onwards, you must use the new forms without the extra information.
- If you complete the air waybill for a consignment requiring a Shipper's Declaration, you must use the phrase "as per associated Shipper's Declaration" rather than "as per attached Shipper's Declaration."

THE APPENDICES

There are some new or changed definitions in Appendix A, the Glossary. And, as usual, the list of competent authority contacts in Appendix D has been updated to reflect the most recent information.

Appendix E, the list of packaging suppliers and testing facilities, has links and QR codes rather than written contact information for the suppliers. Oops, the one for UN Specification packaging manufacturers is currently broken. We hope it will be fixed closer to the effective date of the book.



YOUR GROWTH IS OUR GOAL!

*We have been creating complete
cost-effective dangerous goods
solutions for our customers since 1987.*



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WHAT SHOULD YOU DO ABOUT THE NEW IATA RULES?

Unlike some of the sweeping changes we've seen in previous years, the upcoming 2025 edition 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 order your copy of the 2025 edition of the DGR now so you can see the final version well in advance of the 2025 deadline.

CONCLUSIONS

The earlier the better when it comes to updating your regulatory requirements. We hope you and your team found this IATA DGR 2025 New Rules guide informative and helpful. Would you like to learn more about our courses or products that ensure regulatory compliance for your business? Check out our website or speak to one of our knowledgeable customer service representatives today.

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