



What's in a word? Specifically, the word "Variation"? When it comes to the IATA Dangerous Goods Regulations – a lot! The Merriam-Webster Learner's Dictionary provides a definition of 'variation' as "*something that is similar to something else, but different in some way*". In our dangerous goods training, we learn that both States (countries) and Operators (airlines) may and do publish Variations to the ICAO Technical Instructions and the IATA Dangerous Goods Regulations. Yet these 'differences' are often overlooked during the preparation of a dangerous goods shipment – leading to rejected or frustrated consignments, and in some cases, possible penalties for violation of the regulations. Besides the fact that failure to comply with Variations is one of the most common reasons for shipment rejection, failure to comply with an applicable State variation is a violation of that country's regulations!

Variations can greatly affect the way a shipment is prepared for transport. Subsection 2.8 of the 58th Edition of the IATA Dangerous Goods regulations lists 48 States that have published Variations; the list of Operators publishing Variations spans two full pages. In fact, Subsection 2.8 takes up fully 108 pages of the DGR – why is it so frequently ignored?? Perhaps shippers ignore the Variations in haste, perhaps they don't understand what the Variations mean, maybe they think only the Variations shown in a Packing Instruction may be applicable, or possibly they simply don't remember where to look at all.

IATA DGR 2.8.0.2 states that "Variations against commodities in the List of Dangerous Goods are referenced in the appropriate packing instructions. Variations related to the text of these Regulations are referenced under the subsection heading." A simple example: U.S. Variation USG-12 requires a 24-hour Emergency Response telephone number to be shown on the Shipper's Declaration, and also requires that written Emergency Response Information be immediately available with the shipment. USG-12 is not shown in any Packing Instruction, as it is a DOCUMENTATION requirement. Where *is* it referenced? Logically, in Section 8, Documentation – under Subsection 8.1.6.11 "Additional Handling Information", as this is where the 24-hour telephone number is typically shown on the DGD. Variations are shown throughout the Regulations, and accordingly, IATA DGR 2.8.0.3 states "Although every effort is made to keep these references current, the shipper is advised to check for applicable variations under the appropriate State(s) listing in 2.8.2 and operator(s) listing in 2.8.4."

So, in summary, what does this mean to the Shipper? **Read ALL Variations of your countries of origin, transit (if you know) and destination, read ALL of your Operator(s)'s Variations, and be sure to comply with any State and/or Operator Variations that apply to your shipment.** Yes, it can sometimes take a bit of time, but it's definitely worthy of it if it means your shipment will move without problems. Very importantly, if you don't understand the meaning of a Variation – find out. It may save you a lot of money and frustration.

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