



HM-206F & USG-12 Clarification

20 October 2010

US DOT PHMSA final rule HM-206F (publication October 2009, effective 1 October 2010) has recently modified some of the requirements related to State Variation USG-12 and the provision of a 24-hour emergency telephone number. This change has caused some confusion with regard to acceptance and therefore IATA is providing the following information as clarification from US DOT PHMSA.

Background:

The rule making was brought out to address a particular problem for inter-modal transshipment where the “offeror” becomes the shipper on the DGD and in those instances the link to the 3rd Party Emergency Response Information (ERI) provider was lost.

If the shipper is named on the Shipper's Declaration (person or company/organization) there is no requirement to add any additional information in association with the emergency response telephone number.

“The HM-206F final rule requires a shipping paper to identify the offeror of the shipment when an ERI provider is used to comply with the requirements of § 172.604. The final rule provides an exception in § 172.604(b)(1) to this requirement. The name of the person registered with the ERI provider is not required to be entered on the shipping paper in association with the ER telephone number if the name of the person is entered elsewhere on the shipping paper in a prominent, readily identifiable, and clearly visible manner that allows the information to be easily and quickly found. Therefore, provided the registrant's name is already entered elsewhere in this manner, there is no requirement to add the name twice. We will revise the regulatory text to clarify this issue in a future rulemaking.”

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For example: if the shipper or consignee on the Shipper's Declaration for Dangerous Goods is the party registered with the ERI provider, there is no need to add a second notation to that effect on the Shipper's Declaration for Dangerous Goods.

HM-206F new requirements include:

- The initial shipper/offeror name must be transferred to subsequent shipping documents when hazardous materials shipments are transferred between carriers or modes of travel.
- When the Emergency Response Telephone Number is to an ERI service provider (e.g. Chemtrec or Chemtel) and the original shipper's name (company name) *does not otherwise* appear on the shipping document, either their name or contract number must appear on the shipping document. It is suggested this information appear in conjunction with the emergency response phone number.
Note: *The "Contact Name" is to be the subscriber name and not the name of the ERI service. The definition of "person" is included at §171.8 and does not need to be the name of an individual.*
- When shipments from multiple offerors are consolidated and described on one single declaration the ERI information should be entered above, below, before or after the entry which it applies.

HM-206F Clarifications:

- International telephone numbers must include the country code and city code. Access Codes are no longer required. Example: +1 514 874 0202.

Note: *USG-12 has been modified by US DOT as published in the 52nd Edition of the IATA DGR and the 2011-2012 Edition of the ICAO Technical Instructions.*