



**WORKING PAPER**

**DANGEROUS GOODS PANEL (DGP)**

**TWENTY-SIXTH MEETING**

**Montréal, 16 to 27 October 2017**

**Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air (Doc 9284)* for incorporation in the 2019-2020 Edition**

**ULD TAG PROVISIONS**

(Presented by L. Cascardo)

**SUMMARY**

This working paper invites the DGP to discuss the possible lack of requirements for ensuring the information about dangerous goods in unit load devices is legible and visible at all times. The DGP is also invited to consider the suggested amendment presented in the appendix to this working paper.

**Action by the DGP:** The DGP is invited to discuss the current requirement for clearly specifying that the information about dangerous goods in unit load devices be visible at all times and to consider amending the Technical Instructions as proposed in Appendix B to this working paper.

**1. INTRODUCTION**

1.1 Part 7;2.8 states that unit load devices containing dangerous goods which require a class hazard label must display an identification tag on the exterior indicating that dangerous goods are contained within, unless those hazard class labels are themselves visible. Part 7;2.8 also contains some specifications about the tag.

1.2 These requirements clearly specify that the information must be legible and visible when the tag is placed inside a protective tag holder. The same provision is not clear when the tag is not placed inside a protective tag holder.

1.3 Appendix A shows some examples identified on-site. The second picture shows an identification tag that was visible but the information on it was not visible at all times since the tag kept flipping during transport.

1.4 This proposal suggests changing Part 7;2.8.2 a), to avoid situations when the tag is not inside a protective tag holder, but the information is not legible or visible.

2. **ACTION BY THE DGP**

2.1 The DGP is invited to consider the suggested amendment as shown in Appendix B to this working paper.

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**APPENDIX A**

**EXAMPLES IDENTIFIED ON-SITE**



This could be considered clearly as a non-compliance to the TIs 7;2.8.3

The identification tag itself is visible but the information on it is not visible at all times. There is a lack of a clear requirement to avoid that.

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**APPENDIX B**

**PROPOSED AMENDMENT TO PART 7 OF THE TECHNICAL INSTRUCTIONS**

**Part 7**

**OPERATOR'S RESPONSIBILITIES**

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**Chapter 2**

**STORAGE AND LOADING**

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**2.8 IDENTIFICATION OF UNIT LOAD DEVICES CONTAINING DANGEROUS GOODS**

2.8.1 Each unit load device containing dangerous goods which require a class hazard label must display an identification tag on its exterior indicating that dangerous goods are contained within the unit load device, unless those hazard class labels are themselves visible.

2.8.2 The identification tag must:

- a) have a border of prominent red hatchings on both sides and the information on it must be legible and visible at all times;
- b) have minimum dimensions of 148 mm x 210 mm; and
- c) be legibly marked with the primary and subsidiary hazard class(es) or division(s) numbers of such dangerous goods.

2.8.3 When placed inside a protective tag holder, the information on the identification tag must be legible and visible.

2.8.4 If the unit load device contains packages bearing the "Cargo aircraft only" label, either that label must be visible or the identification tag must indicate that the unit load device can be loaded only on a cargo aircraft.

2.8.5 The identification tag must be removed from the unit load device immediately after the dangerous goods have been unloaded.

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