



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
MEETING OF THE WORKING GROUP OF THE WHOLE**

The Hague, 3 to 7 November 2008

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 2011/2012 Edition

2.5 Part 5 — Shipper's Responsibilities

SUBSIDIARY RISK LABELS

(Presented by D. Brennan)

SUMMARY

This paper invites the DGP-WG/08 to consider revising text regarding subsidiary risk labels.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 At a recent meeting of the IATA Dangerous Goods Board, the IATA Dangerous Goods Training Task Force (DGTTF) presented a paper regarding the consistent usage of terminology and the importance from a pedagogical perspective.

1.2 One particular issue was raised by the DGTTF as causing some confusion among students, particularly those new to dangerous goods, and that is in relation to the terms “hazard label” and “risk label”. These two terms are used interchangeably through the Technical Instructions, although “risk label” is generally prefaced by “subsidiary”. However, the two terms are synonymous.

1.3 Prior to the 2001-2002 Edition of the Technical Instructions, there was a difference between the hazard labels on a package identifying the primary risk and those used to identify any subsidiary risk(s). Those differences were removed with effect 1 July 2001 and all hazard labels must now bear the class or division number, as applicable, to identify the risk.

1.4 Much of the language that was in use prior to 2001 to describe the applicability of the hazard labels still remains including the text in Part 5.3.1.2 which specifically refers to labels identifying primary and subsidiary risks having to bear the class or division number.

1.5 It is recognized that most of the text referring to “hazard label” and “risk label” originates with the UN Model Regulations and that it would be improper for the Technical Instructions to be revised without consideration from the UN Subcommittee. The purpose of this paper is to seek the view of the Panel with respect to the issue and so see if the panel supports a “clean up” of the language used to consistently apply a single term to describe the labels. It is suggested that correct term to use is “hazard label”.

1.6 One area that could perhaps be revised by the panel is the deletion of 5;3.1.2, which has no equivalent in the UN Model Regulations. As it is now over seven years since the difference between the hazard labels for the primary and subsidiary risk was removed, this paragraph would appear to have lost its relevance.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to:

- a) provide comments on the need for the introduction of consistent terminology to describe hazard labels. If the panel agrees that there should be a single consistent term used, then a paper will be prepared for the July 2009 meeting of the UN Subcommittee; and
- b) to delete paragraph 3.1.2 in Part 5, Chapter 3 as follows:

3.1 THE REQUIREMENT TO LABEL

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~~— 3.1.2 Labels identifying the primary and subsidiary risks of the dangerous goods must bear the class or division number as required in 3.5.1.~~

~~3.1.3~~ 3.1.2 All labels must be able to withstand open weather exposure without a substantial reduction in effectiveness.

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