



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/21)**

Virtual Meeting, 24 to 28 May 2021

Agenda Item 2: Managing air-specific safety risks and identifying anomalies

2.2: Develop proposals, if necessary, for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2023-2024 Edition

REPLACEMENT OF MARKS

(Presented by D. Brennan)

SUMMARY

This working paper proposes revision to the provision in Part 7;2.7 — Replacement of labels to include provision for the operator to replace marks found to have become lost, detached or illegible after the dangerous goods have been accepted.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 At DGP-WG/20 a proposal to revise the existing text in Part 7;2.7 addressing the replacement of labels to include the replacement of marks was made (see paragraph 3.2.2.6 of the DGP-WG/20 Report).

1.2 The proposal stemmed from the increased alignment with the UN Model Regulations where the term “mark” is applied to information applied on a package other than the hazard label, with much of this information, such as the lithium battery mark, excepted quantities mark and environmentally hazardous substance mark, being applied by means of a self-adhesive label.

1.3 While there was much support for the proposal, there was some concern expressed that the wording proposed was too broad and the replacement of marks should not include the marks such as the name and address of the shipper and consignee, UN number and proper shipping name. There was also concern on the amendment to include reference to “other documentation” in addition to the dangerous goods transport document.

1.4 The proposal in this working paper now limits the replacement of marks to those required by paragraphs 5;2.4.9, 5;2.4.11, 5;2.4.12 and 5;2.4.16.

1.5 With respect to the reference to “other documentation”, it is proposed to instead make reference to “other transport documentation, such as an air waybill” as there are packages that are required to bear labels where there is no requirement for a dangerous goods transport document. Examples of these are dry ice and radioactive material, excepted packages.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to consider revising Part 7;2.7 as shown in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENT TO PART 7 OF THE TECHNICAL INSTRUCTIONS

Part 7

OPERATOR'S RESPONSIBILITIES

...

Chapter 2

STORAGE AND LOADING

...

2.7 REPLACEMENT OF MARKS AND LABELS

When an operator discovers that any of the marks required by 2.4.9, 2.4.11, 2.4.12 or 2.4.16 or labels for packages of dangerous goods have become lost, detached or illegible the operator must replace them with appropriate marks or labels in accordance with the information provided on the dangerous goods transport document or other transport document such as an air waybill, when applicable.

...

— END —