DANGEROUS GOODS PANEL (DGP)

MEETING OF THE WORKING GROUP OF THE WHOLE

Abu Dhabi, 4 to 8 October 2004

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions* for incorporation in the 2007/2008 edition
2.5: Part 5 — Shipper's Responsibilities

ORIENTATION OF PACKAGES IN AN OVERPACK

(Presented by G.A. Leach)

1. INTRODUCTION

1.1 Single packagings containing liquids are not required to bear Package Orientation labels, therefore there is no requirement for such labels to appear on the outside of an overpack containing such packagings. Additionally, there appears to be no requirement in the Technical Instructions for such packagings to be packed in an overpack such that end closures are upwards. Consequently, there is potential for an overpack packed in such a manner not to be handled by the operator in accordance with Part 7; 2.3.

1.2 Whilst considering this working paper, it became apparent that the requirements for marking of overpacks are far clearer than those for labelling of overpacks i.e. 5;2.4.9 is a dedicated paragraph on marking whilst labelling is contained within 5;3.2.1. It is suggested that the provisions for labelling of overpacks should be given as high a profile as those for marking.

1.3 It is also noted that 5;2.4.9 (marking of overpacks) also contains reference to labelling of overpacks. It is suggested this stems from an inappropriate alignment with the UN Model Regulations; the text now appearing in 5;2.4.9 is taken from Chapter 5.1 "General Provisions" of the UN (for marking and labelling), not text dedicated to the subject of marking. It is suggested 5;2.4.9 should be amended and a new provision for labelling of overpacks be added to 5;3 which would address this issue and still maintain alignment with UN. It is also suggested that the reference to the air eligibility marking has been retained inadvertently and should be deleted.

2. **PROPOSAL**

2.1 Amend Part 5; 2.4.9 as follows:

"An overpack must be marked with the word "Overpack" with the proper shipping name, UN number, "limited quantities" (when applicable), ~~air eligibility marking,~~ and special handling instructions ~~and labeled, as required for packages by Chapter 3,~~ for each item of dangerous goods contained in the overpack unless markings ~~and labels~~ representative of all dangerous goods in the overpack are visible."

2.2 Amend Part 5; 3.2.1 as follows:

3.2.1 The labels required to be displayed on packages of dangerous goods are identified in the Dangerous Goods List for articles and substances specifically listed by name and for articles and substances not specifically listed by name which are covered by generic or n.o.s. entries. ~~Labels required on packages within an overpack must be clearly visible in accordance with the provisions of 3.2.7 and 3.2.11 a) or be reproduced on the outside of the overpack such that the provisions of those paragraphs would be met in regard to the locations of the labels on the overpack.~~

2.3 Add a new paragraph 3.X as follows:

3.X Labelling of overpacks

3.X.1 An overpack must be labelled as required for packages by Chapter 3, for each item of dangerous goods contained in the overpack unless labels representative of all dangerous goods in the overpack are visible.

3.X.2 An overpack containing single packages with end closures containing liquid dangerous goods must be labelled with either the "Package Orientation" label (figure 5-24), or pre-printed package orientation labels meeting the same specification as either Figure 5-22 or ISO Standard 780-1985, unless such labels are affixed to the package and are visible from the outside of the overpack. Such labels must be affixed to or printed on at least two opposite vertical sides of the overpack with the arrows pointing in the direction required to indicate the orientation of the overpack required to ensure that end closures are upward, notwithstanding that such single packages may also have side closures.

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