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

APPLICATION OF LABELS ON SMALL PACKAGES

(Presented by M. Hinoul)

1. INTRODUCTION

1.1 ICAO Technical Instructions Part 5; 3.2.7(d) requires that when primary and subsidiary risk labels are required they must be displayed next to each other. In addition Part 5;3.2.11 a) 3) requires that when a "Cargo Aircraft Only" label must be used, it must be affixed on the same surface of the package near the hazard labels.

1.2 Unfortunately this creates for small quantities of dangerous goods with multiple hazards a very serious problem. In order to comply with above mentioned provisions very often a too big packaging must be used in comparison with the quantities transported.

> Example: To transport 50 ml of UN 2965 **Boron Trifluoride dimethyl etherate** 4 labels must be displayed on the same surface of the package: Danger when wet / Flammable liquid/ Corrosive and the CAO label.

1.3 Experience has shown that it is not easy to control the movement and the upright position of small inner packagings in a big outer packaging during the whole chain of transport. Undoubtedly this may result in an unsafe situation.

1.4 To gain some space shippers display the hazard labels at an angle of 90° (square shaped), which results very often in a refusal of the package.

2. PROPOSAL

2.1 To solve the problems following proposals are made:

Proposal 1

Add a new paragraph to Part 5; 3.2.7

e) in case of hazard warning labels, be affixed at an angle of 45° (diamond shaped), if the package dimensions are adequate.

Proposal 2

Option A: Add a sentence to Part 5; 3.2.7 d)

d) when primary and subsidiary risk labels are required, be displayed next to each other. If the package dimensions are not adequate and when on the same package minimum 3 hazard labels or minimum 2 hazard labels and in addition a "Cargo aircraft only" label are required, the dimensions of the hazard labels may be reduced by half.

Consequently Part 5; 3.4.1.1 a) must be slightly amended:

a) They must be in the form of a square with minimum dimensions of 100 mm × 100 mm except if 5;3.2.7 d), set at an angle of 45E (diamond shaped) except that labels of 50 mm × 50 mm may be used on packages containing infectious substances where the packages are of dimensions such that they can only bear smaller labels. ...

If the Panel does not agree with option A, option B is proposed:

Option B: Add a sentence to Part 5; 3.2.7 d)

d) when primary and subsidiary risk labels are required, be displayed next to each other. However, when on the same package minimum 3 hazard labels or minimum 2 hazard labels and in addition a "Cargo aircraft only" label are required and when the package dimensions are not adequate, the labels may be displayed on 2 different adjacent sides of the package.

Consequently following amendments must be made:

C Part 5;3.2.11 a) 3):

3) on the same surface of the package near the hazard labels except if 5;3.2.7 d) applies;

C Part 7; 2.4.1 must be amended:

.....Hazard warning labels except if 5; 3.2.7 d) applies and the "Cargo aircraft Only" label must be visible.

— END —