



## **DANGEROUS GOODS PANEL (DGP)**

### **TWENTY-FIRST MEETING**

**Montréal, 5 to 16 November 2007**

**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 2009-2010 Edition**

### **MARKING REQUIREMENTS FOR LIMITED QUANTITY PACKAGINGS**

(Presented by D. Brennan)

#### **SUMMARY**

This working paper proposes that the panel should review the intended requirement to make the marking of the UN number inside a diamond mandatory from 1 January 2009.

Action by the DGP is in paragraph 2.

#### **1. INTRODUCTION**

1.1 At DGP/20 the panel took a decision to add new text to identify that packages containing limited quantities of dangerous goods could have the UN number marking placed inside a diamond to align with the requirements of 3.4.8 of the UN Model Regulations with respect to dangerous goods packed in limited quantities.

1.2 This text, followed by a note indicating that it was anticipated that this marking become mandatory with effect 1 January 2009 was added to Part 5;2.4.1.1.

1.3 The discussion that took place at DGP/20 identified that while it would improve multi-modal harmonization for the Technical Instructions to reflect the UN Model Regulations' provision, there was also a need for text to be added to the UN Model Regulations recognizing the Technical Instructions' requirements for limited quantities, which are more restrictive than the UN.

1.4 The decision taken by the DGP at DGP/20 was presented to the 29<sup>th</sup> meeting UN Subcommittee in a working paper (ST/SG/AC.10/C.3/2006/66) presented by the DGP Secretary. The report of the 29<sup>th</sup> meeting identified that because the Technical Instructions requires that packages containing limited quantities are still required to bear the applicable hazard labels there would still be

disharmony with the UN Model Regulations, and that would cause confusion in ground transport. The report of the 29<sup>th</sup> meeting of the UN Subcommittee on this topic concludes by stating "...the issue would be taken up at the December meeting in the light of further discussions at ICAO."

1.5 As there was no further formal discussion on this matter during the last UN biennium, the provisions of the 15<sup>th</sup> revised edition UN Model Regulations make no mention of the air mode requirements as requested by the DGP during discussions at DGP/20.

1.6 At the last, 31<sup>st</sup> meeting, of the UN Subcommittee an ad hoc group was convened to discuss the development of multi-modal provisions for limited quantities and consumer commodities. From the discussions by the ad hoc group the report of the 31<sup>st</sup> meeting identifies that:

"The Sub-Committee agreed that a wide consultation of the modal organizations concerned would be necessary and requested the secretariat to transmit the report of the working group (INF.48) to the relevant international organizations in order to seek feedback which would allow to develop further proposals at the next session."

## 2. ACTION BY THE DGP

2.1 The DGP is invited to provide feedback to the UN Subcommittee directly through the DGP Secretary and through their respective UN Subcommittee representatives on the content of INF.48, which is attached as an appendix to this working paper. One of the considerations in this should be the development of additional text in the UN Model Regulations with respect to the air mode requirements for limited quantities.

2.2 To allow for appropriate text to be developed for inclusion in the 16<sup>th</sup> revised edition of the UN Model Regulations, the DGP is invited to reconsider making the marking of the UN number inside a diamond for packages containing limited quantities mandatory in the next, 2009-2010, edition of the Technical Instructions. Instead it is recommended that the existing note at the bottom of 5;2.4.1.1 be amended to read:

### 2.4 MARKING SPECIFICATIONS AND REQUIREMENTS

#### 2.4.1 Marking with proper shipping name

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*Note.— It is anticipated that displaying the UN number within a diamond for packages containing limited quantities of dangerous goods will become mandatory as of 1 January ~~2009~~ 2011.*

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APPENDIX

**UN/SCETDG/31/INF.48**

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**COMMITTEE OF EXPERTS ON THE TRANSPORT OF  
DANGEROUS GOODS AND ON THE GLOBALLY  
HARMONIZED SYSTEM OF CLASSIFICATION  
AND LABELLING OF CHEMICALS**

Sub-Committee of Experts on the  
Transport of Dangerous Goods

Thirty-first session  
Geneva, 2-6 July 2007  
Item 4 of the provisional agenda

**Working Group on Limited Quantities  
July 2007**

The principle of having reduced requirements, with some residual level of controls for Limited Quantities was generally agreed. The meeting commenced with a review of all the different requirements to identify areas of disharmony to focus the work. (see table below). It was agreed for the discussion to leave LQ by air out of the discussion because the differences are too great. It was agreed that there was no need to make any changes in the areas of Scope, Threshold, Packing, and Segregation. This left the issues of documentation and marking to be resolved.

**Marking**

The concept of LQ in air mode is too different in terms of definition and exemptions from all other modes so WG left that area open. And it presents minimal problems for other modes **except** for the labelling issue, where DG labelled for air transport (with a DG diamond) are subsequently transported by land. These consumer goods as LQ may need no documentation for land transport for example but carriers may be confused when they see the dangerous goods diamond on the packagings.

It was noted that the principle of a generic marking for LQ and Consumer Commodities for all modes (except LQ by air) was a way forward as this requirement could be accepted even where there is no requirement for marking now.

There is a significant problem for air transport, where surface materials might inadvertently be transported by air in unsuitable packagings. One solution would be to specifically identify materials/packagings that are only suitable for land transport or alternatively, suitable for air and surface transport.

North America recognises the diamond with UN Nos in it as a means achieving compliance with their various domestic regulations. It blends the concepts of Consumer Commodities and LQ to require the same regulatory controls. In this way, North America would also then be able to recognise some new

Universal Mark. And the concept of Consumer Commodities could be dismissed. This would bring the requirements for Europe and North America together.

It appears that air transport needs an indicator of some sort to demonstrate that their Consumer Commodities for air dangerous goods were in compliance with the pressure testing and Air's other unique requirements. This mark is currently the Class 9 label, which does not give specific information; the materials may in fact be flammable liquids etc. The same information could be communicated using a different mark that is compatible with all other modes. Some samples of suggested possible marks are shown below.

The WG noted that the opportunity arises for the ICAO DGP to consider revising terminology such that Consumer Commodities become LQ and a new term is found for LQ. This would substantially improve intermodal transport

Many participants were of the opinion that this generic marking was sufficient but the question was left open for wider consultation with other groups (RID, IMO, ICAO, North America, etc)

### **Documentation**

It appears that the documentation issue may be resolved by accepting the modal documentation. Thus, if North America requires documentation and Europe does not, the intercontinental transport leg will result in documentation that will be acceptable for land transport at the consignee end of the transport route.

**LQ/Consumers Commodities Provisions In The Different Modes And Regulations 2007/07/04**

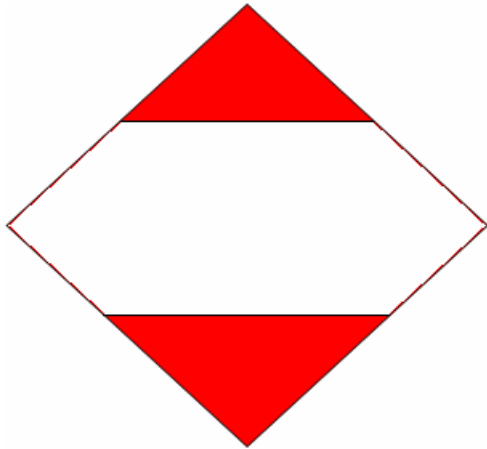
<b>Provisions</b>		<b>UN</b>	<b>IMDG</b>	<b>ICAO</b>	<b>RID/ADR</b>	<b>49 CFR</b>	<b>TDG Canada</b>
SCOPE in terms of class and PG	LQ	According to DGL	Same as UN	Same as UN	Same as UN	Same as UN except PGII 6.1	Same as UN
	Consumer Commodities	Same as LQ Definition based on the destination of the product	Same as UN	Restricted to CI3 PG II 6.1,PG III aerosols Note 1.	Same as UN	Same as UN except PGII 6.1	Same as UN
THRESHOLD	LQ	According to DGL	Same as UN	More restrictive Note 1	Same as UN	Same as UN	Same as UN
	Consumer Commodities	Same as LQ	Same as UN	Specific limits smaller than UN LQ Note 1		Same as LQ	Same as LQ
PACKING	LQ	General instructions	Same as UN	General instructions Capability test drop +stacking Note 1	Same as UN	Same as UN	Similar to UN General Instruction
	Consumer Commodities	General instructions	Same as UN	Capability test drop filling ratio Note 1	Same as UN	Same as UN	Similar to UN General Instruction
SEGREGATION	LQ	Inside the outer packaging	Same as UN	Same as UN	Same as UN	Same as UN	No specific requirements
	Consumer Commodities	Same as LQ	Same as LQ	Same as LQ	Same as LQ	Same as UN	No Specific requirements
PACKAGE MARKING	LQ	Specific: UN No.	Specific: UN No.	Specific: Full package labelling.	UN No or generic label.	Specific: PSN or UN NO	Generic: Word L- Q-
	Consumer Commodities	None [but open to change].	None but open to change.	Generic: ID8000 label CI 9 Consumer Commodities	Generic: No specific provisions Consumer Commodities are shipped under LQ	Generic: ORM-D	Generic: Word L- Q-

<b>Provisions</b>		<b>UN</b>	<b>IMDG</b>	<b>ICAO</b>	<b>RID/ADR</b>	<b>49 CFR</b>	<b>TDG Canada</b>
DOCUMENTATION	LQ	Yes	Yes	Yes	No	Yes	Over 500 kg from one consignor – with Ltd Qty and class
	Consumer Commodities	None	Yes	Yes declared as ID8000	No	Yes	Same as LQ

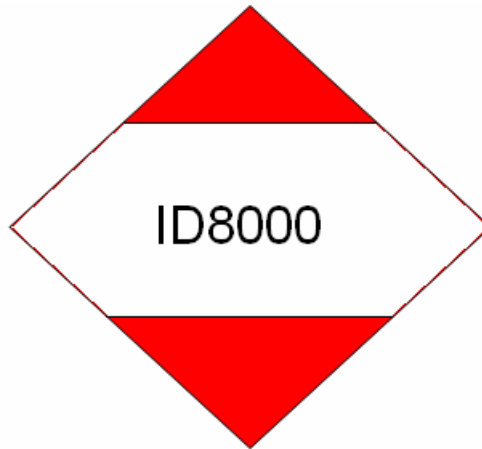
Note 1 problem for air mode mainly as materials can go from air to other modes. No change needed.

### Potential New Limited Quantity Marking

Surface Modes:



Air Mode\*:



\*Note: Suggested Air Mode marking is a suggestion only and would of course need to be discussed by the ICAO Dangerous Goods Panel.

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