



## DANGEROUS GOODS PANEL (DGP)

### TWENTY-THIRD MEETING

Montréal, 11 to 21 October 2011

**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 2013-2014 Edition**

### PROVISION FOR REDUCED SIZE LABELS

(Presented by the Dangerous Goods Advisory Council)

#### SUMMARY

This paper proposes to amend Part 5;3.5.1.1 a) of the Technical Instructions to permit reduced size labels on small packages.

**Action by the DGP:** The DGP is invited to amend the first sentence of Part 5;3.5.1.1 a) as shown in the appendix to this working paper.

## 1. INTRODUCTION

1.1 In setting out the specifications for labels in the UN Model Regulations, paragraph 5.2.2.2.1.1 states:

Labels shall be in the form of a square set at an angle of 45° (diamond-shaped) with minimum dimensions of 100 mm by 100 mm, **except that in the case of packages of such dimensions that they can only bear smaller labels** and as provided in 5.2.2.2.1.2.

Similar text is provided in the IMDG Code for sea transport and in the ADR and RID for European road and rail transport.

1.2 The corresponding text in 5;3.5.1.1 a) of the Technical Instructions only permits reduced-sized labels of 50 mm by 50 mm for infectious substances. In addition, gas cylinders may bear smaller labels in accordance with 5;3.5.1.1 d). For Division 6.2, it would seem relief was provided due to practical considerations. Namely, some small Division 6.2 packages preclude effective use of full-size labels. For gas cylinders, reduced label sizes are also permitted out of practical considerations — to permit placement of labels on cylinder shoulders.

1.3 Similar practical considerations led the UN Subcommittee to provide for reduced-sized labels in the case of packages for other dangerous goods. Under existing requirements, when such packages — which are commonly prepared for sea or ground transport, where reduced size labels are permitted — are offered for air transport, full-sized labels must be applied. In some cases, package size results in full-size labels extending around to another side of the package. The problem is compounded when more than one label must be applied. The disharmony between air requirements and requirements for other modes frustrates transport. In addition, there is the potential that other required safety data, such as data relating to use of the material, is obscured when the larger full-sized labels are applied. To avoid these problems, DGAC proposes that 5.3.5.1.1 a) be amended to permit a minimum size of 50 mm by 50 mm for all packages of dangerous goods where package size warrants.

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APPENDIX A

PROPOSED AMENDMENT TO THE TECHNICAL INSTRUCTIONS

Part 5

SHIPPER'S RESPONSIBILITIES

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Chapter 3

LABELLING

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3.5 LABEL SPECIFICATIONS

3.5.1 Class hazard label specifications

3.5.1.1 Class hazard labels must conform to the following specifications:

- a) They must be in the form of a square with minimum dimensions of 100 mm × 100 mm, set at an angle of 45° (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. They must have a line 5 mm inside the edge and running parallel with it. In the upper half of a label the line must have the same colour as the symbol and in the lower half it must have the same colour as the figure in the bottom corner. Labels are divided into halves. With the exception of Divisions 1.4, 1.5 and 1.6, the upper half of the label must contain the pictorial symbol and the lower half must contain the class or division number (and for goods of Class 1, the compatibility group letter) as appropriate. The label may include text such as the UN number or words describing the hazard class or division (e.g. "flammable") in accordance with f) provided the text does not obscure or detract from the other required label elements.

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