



WORKING PAPER

DANGEROUS GOODS PANEL (DGP)

TWENTY-FOURTH MEETING

Montréal, 28 October to 8 November 2013

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 2015-2016 Edition

VISIBILITY OF ULD TAG

(Presented by M. Paquette)

SUMMARY

This working paper proposes modifications to Part 7;2.8.4 to specify that when an identification tag is used on a unit load device it must be visible, including when placed inside a protective tag holder.

Action by the DGP: The DGP is invited to consider revisions to the provisions of Part 7;2.8 as shown in the appendix to this working paper.

1. INTRODUCTION

1.1 At the DGP Working Group of the Whole Meeting in Montreal (DGP-WG/13, 15 to 19 April 2013), it was proposed to include a note under Part 7;2.8.4 to emphasize that unit load device (ULD) identification tags should be clearly visible through protective pouch windows. The need for the note was prompted by discoveries during dangerous goods ramp inspections of worn-away protective pouches or other labels restricting the visibility of information on the tags (see Figure 1).

1.2 There was much support for the proposal as it was recognized as a common problem. The following revisions were suggested:

- a) replacing the word “pouch” with “tag holder”;
- b) changing the note into regulatory text; and
- c) indicating that the red hatchings around the tag be also visible.

1.3 The first two revisions have been addressed in this working paper. However, we question whether the last revision is relevant. Identification tags have specified dimensions, contain red hatchings on both sides and are marked with the primary and subsidiary hazard class(es) or division(s) numbers. By requiring that the identification tag be visible, it is expected that both the hatchings and the numbers will be visible.



Figure 1. Obscured information on a ULD tag inside a protective tag holder

APPENDIX

PROPOSED AMENDMENT TO PART 7 OF THE TECHNICAL INSTRUCTIONS

Part 7

OPERATOR'S RESPONSIBILITIES

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Chapter 2

STORAGE AND LOADING

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Proposal 1

2.8 IDENTIFICATION OF UNIT LOAD DEVICES CONTAINING DANGEROUS GOODS

2.8.1 Each unit load device containing dangerous goods which require a class hazard label must clearly display on its exterior an indication that dangerous goods are contained within the unit load device, unless those hazard class labels are themselves visible.

2.8.2 This indication must be provided by attaching to the unit load device an identification tag having a border of prominent red hatchings on both sides and the minimum dimensions of 148 mm x 210 mm. The primary and subsidiary hazard class(es) or division(s) numbers of such dangerous goods must be clearly marked on this tag. The identification tag must be visible, including when placed inside a protective tag holder.

2.8.3 If the unit load device contains packages bearing the "Cargo aircraft only" label, either that label must be visible or the identification tag must indicate that the unit load device can be loaded only on a cargo aircraft.

2.8.4 The identification tag must be removed from the unit load device immediately after the dangerous goods have been unloaded.

Proposal 2

2.8 IDENTIFICATION OF UNIT LOAD DEVICES CONTAINING DANGEROUS GOODS

2.8.1 Each unit load device containing dangerous goods which require a class hazard label must clearly display an identification tag on its exterior ~~an indication indicating~~ that dangerous goods are contained within the unit load device, unless those hazard class labels are themselves visible.

2.8.2 ~~This indication~~ The identification tag must be provided by attaching to the unit load device ~~an identification tag~~ having:

- a) have a border of prominent red hatchings on both sides; ~~and the~~
- b) have minimum dimensions of 148 mm x 210 mm; ~~;~~
- c) be marked with the primary and subsidiary hazard class(es) or division(s) numbers of such dangerous goods ~~must be clearly marked on this tag;~~
- d) indicate that the unit load device can be loaded only on a cargo aircraft if the unit load device contains packages bearing the "Cargo aircraft only" label;
- e) be visible, including when placed inside a protective tag holder; and
- f) be removed from the unit load device immediately after the dangerous goods have been unloaded.

~~2.8.3 If the unit load device contains packages bearing the “Cargo aircraft only” label, either that label must be visible or the tag must indicate that the unit load device can be loaded only on a cargo aircraft.~~

~~2.8.4 The tag must be removed from the unit load device immediately after the dangerous goods have been unloaded.~~

Proposal 3

2.8 IDENTIFICATION OF UNIT LOAD DEVICES CONTAINING DANGEROUS GOODS

2.8.1 Each unit load device containing dangerous goods which require a class hazard label must ~~clearly~~ display an identification tag on its exterior ~~an indication indicating~~ that dangerous goods are contained within the unit load device, unless those hazard class labels are themselves visible.

2.8.2 ~~This indication~~The identification tag must be provided by attaching to the unit load device an identification tag ~~having:~~

a) have a border of prominent red hatchings on both sides; ~~and the~~

b) have minimum dimensions of 148 mm x 210 mm; ~~;~~

c) be marked with the primary and subsidiary hazard class(es) or division(s) numbers of such dangerous goods ~~must be clearly marked on this tag; and~~

d) be visible, including when placed inside a protective tag holder.

2.8.3 If the unit load device contains packages bearing the “Cargo aircraft only” label, either that label must be visible or the tag must indicate that the unit load device can be loaded only on a cargo aircraft.

2.8.4 The tag must be removed from the unit load device immediately after the dangerous goods have been unloaded.

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