



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

Agenda Item 6: Other business

INTRODUCTION OF THE UN GLOBALLY HARMONIZED SYSTEM FOR MARKING AND LABELLING OF CHEMICALS (GHS)

(Presented by D. Brennan)

SUMMARY

This working paper proposes a small revision to Part 7;6 to make specific reference to packages that bear the UN Globally Harmonized System for Marking and Labelling Chemicals (GHS) pictograms. The paper also seeks the panel's opinion as to whether in the next biennium there should be some additional work to look at bringing into the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) some recommendations for shippers of products bearing GHS pictograms or perhaps guidance in the Supplement or on the ICAO website to address the GHS.

Action by the DGP: The DGP is invited to add an additional paragraph into Part 7, Chapter 1 as shown in the appendix to this working paper.

The panel is also invited to consider if over the 2014-2015 biennium some guidance material on the GHS should be developed for inclusion into the Supplement to make the connection between the provisions for the transport of dangerous goods and the GHS provisions for supply and use.

1. INTRODUCTION

1.1 As the UN Globally Harmonized System for Marking and Labelling Chemicals (GHS) is implemented by States, operators are starting to see packages presented for transport that bear the diamond-shaped pictograms adopted by the GHS to identify hazardous substances.

1.2 In many instances these goods are presented for transport as being “non-dangerous goods”, which raises concerns for operators as the presence of these pictograms can be seen as an indication that the goods have not been properly declared and may in fact be dangerous goods.

1.3 While some pictograms identify substances that only pose a hazard for supply and use, the other GHS pictograms contain symbols that are largely equivalent to the symbols contain in the hazard labels used in transport, and which may therefore be classified as dangerous goods. This then generates uncertainty for the operator cargo acceptance personnel seeing GHS pictograms on packages that the substances have been correctly classified.

e.g.



1.4 Unfortunately, despite the best efforts of the UN Subcommittees for Transport and for GHS a fully harmonized list of substances without any overlap between dangerous goods and hazardous substances is still time away. In addition there is also quite an amount of work at the regional and/or national level to address existing lists of chemicals to achieve harmonisation and remove overlap.

1.5 For these reasons it is believed that there should be some reference in the Technical Instructions to at least make some mention of the need for operators to be aware of the GHS pictograms and to take appropriate action so that they are satisfied, to the extent possible, that the goods presented for transport comply with the provisions of the Technical Instructions.

APPENDIX

PROPOSED AMENDMENT TO PART 7 OF THE TECHNICAL INSTRUCTIONS

Part 7

OPERATOR'S RESPONSIBILITIES

Chapter 1

ACCEPTANCE PROCEDURES

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1.1 CARGO ACCEPTANCE PROCEDURES

1.1.1 Operators' acceptance staff must be adequately trained to assist them in identifying and detecting dangerous goods presented as general cargo.

1.1.2 Cargo acceptance staff should seek confirmation from shippers about the contents of any item of cargo where there are suspicions that it may contain dangerous goods, with the aim of preventing undeclared dangerous goods from being loaded on an aircraft as general cargo. Many innocuous-looking items may contain dangerous goods, and a list of general descriptions which, experience has shown, are often applied to such items is shown in Chapter 6.

1.1.3 Diamond-shaped GHS pictograms on packages may indicate the presence of dangerous goods. Cargo acceptance staff should seek confirmation from the shipper of the classification where the contents are consigned as general cargo. While some pictograms identify substances that only pose a hazard for supply and use, other GHS pictograms contain symbols that are largely equivalent to the symbols contained in the hazard labels used in transport, and which may therefore be classified as dangerous goods.

Note.— Often general names are used in the description of the content of a cargo shipment. To assist in the detection of undeclared dangerous goods, acceptance staff should check shipping documents with the general description stated on the air waybill and, if necessary, request documentary evidence from shippers that the shipment does not contain dangerous goods.

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