



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/20)**

Virtual, 19 to 23 October 2020

Agenda Item 2: Managing air-specific safety risks and identifying anomalies

2.2: Develop proposals, if necessary, for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air (Doc 9284)* for incorporation in the 2023-2024 Edition

REPLACEMENT OF MARKS BY THE OPERATOR

(Presented by D. Brennan)

SUMMARY

This working paper proposes revision to the provisions in Part 7;2.7 regarding replacement of labels to include provision for the operator to replace marks found to have become lost, detached or illegible after the dangerous goods have been accepted.

Action by the DGP-WG: The DGP-WG is invited to consider the proposed revision to Part 7;2.7 as shown in the appendix to this working paper.

1. INTRODUCTION

1.1 The Technical Instructions has had a long-standing provision set out in Part 7;2.7 that permits the operator to replace labels on packages of dangerous goods where the label is found to have become lost, detached or illegible.

1.2 This provision recognizes that hazard or other labels applied to packages of dangerous goods may be scuffed, get torn off or otherwise removed during the transport process and that when this is identified, the operator must replace it to ensure that the hazard communication provided by the label is again visible to everyone in the transport system.

1.3 When this provision was adopted, marks applied to packages were limited to the UN number and proper shipping name, the name and address of the shipper and consignee and UN specification packaging marks, when required.

1.4 However, over the last eight or so years as there has become closer harmonization with the UN Model Regulations and greater harmonization across the modes, the Technical Instructions has

adopted more “marks” such as for dangerous goods in excepted quantities, limited quantities, lithium batteries, UN 3373 — **Biological substance, Category B** and UN 3245 — **Genetically modified micro-organisms**. Many of these marks though are applied by the shipper to the package by way of a self-adhesive label, notwithstanding that they are defined as a “mark” in the regulations.

1.5 The issue for the operator is that the packages bearing these marks will be subject to the same rigours during transport and may become lost, detached or illegible just the same as hazard or handling labels and yet there is no allowance for the operator to replace such marks as is provided for labels.

1.6 To address this, it is proposed to revise the provision in Part 7;2.7 to include a requirement for the operator to also replace marks should they be identified as being lost, detached or illegible. It is also proposed to include “other documentation” as a source of information from which to identify the marks that are required on packages, in addition to the dangerous goods transport document, recognizing that some dangerous goods, such as Section II lithium batteries and UN 3373, do not require a dangerous goods transport document.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to consider revising Part 7;2.7 as shown in the appendix to this working paper.

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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2.7 REPLACEMENT OF MARKS AND LABELS

When an operator discovers that marks or labels for packages of dangerous goods have become lost, detached or illegible the operator must replace them with appropriate marks or labels in accordance with the information provided on the dangerous goods transport document or other documentation, when applicable.

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