



DANGEROUS GOODS PANEL (DGP) MEETING OF THE WORKING GROUP OF THE WHOLE

The Hague, 3 to 7 November 2008

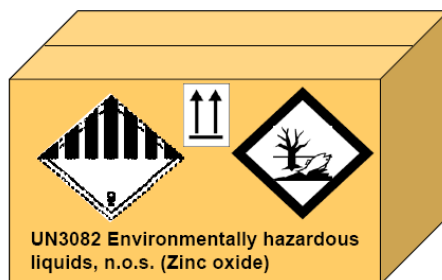
Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2011/2012 Edition

GUIDANCE MATERIAL FOR SHIPMENTS MARKED WITH THE ENVIRONMENTALLY HAZARDOUS SUBSTANCES-MARK

(Presented by CEFIC)

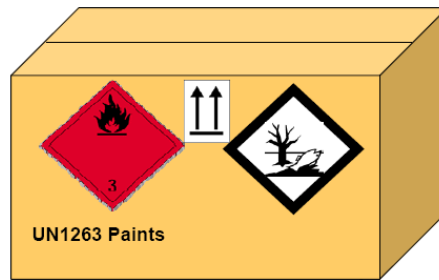
Version 1)

The ICAO Technical Instructions (TI's) 2009-2010, paragraph 5;2.4.9 requires the Environmentally Hazardous Substance (EHS) mark for UN 3077 and UN 3082 only.



The IMDG-Code, Amendment 34-08, which will become mandatory on 1 January 2010 (voluntary application as of 1 January 2009), require applying the EHS mark

- in addition to the standard danger label(s) for substances of Classes 1 to 9, other than UN 3077 or UN 3082
- in addition to the danger label for class 9 for substances, classified as UN 3077 or 3082



ADR- (European Regulations for the transport of Dangerous Goods by Road) and RID- (European Regulations for the transport of Dangerous Goods by Rail) marking legislation coming into force on 1 January 2009 are identical with amendment 34-08 of the IMDG Code with the only difference of a transitional period until 1 January 2011 for substances of Classes 1 to 9, other than UN 3077 or UN 3082.

A substantial number of companies will shift to the new EHS marking legislation by 1 January or 1 July 2009, even for substances of Classes 1 to 9, other than UN 3077 or UN 3082.

Considering that the Technical Instructions do not require the EHS mark for shipments other than UN 3077 or 3082, it cannot be excluded that problems will emerge on the interface between the land and air mode (i.e. during the dangerous goods acceptance) with packagings marked as such notwithstanding that the Technical Instructions do tolerate markings of other regulations (Paragraph 5;2.4.11).

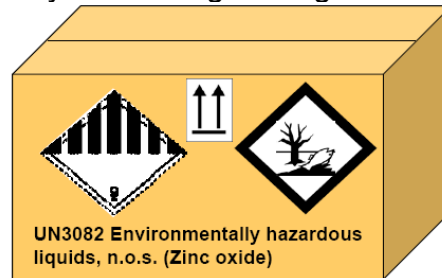
During the acceptance check procedure, packagings with Dangerous Goods other than UN 3077/82 bearing in addition to the hazard label(s) the EHS-mark, should not be rejected!

Version 2)

The ICAO Technical Instructions (TI's) 2009-2010, paragraph 5; 2.4.9 require the Environmentally Hazardous Substance mark be shown on packages for UN 3077 Environmentally Hazardous Substance, solid n.o.s. and for UN 3082 Environmentally Hazardous Substance, liquid n.o.s. only:

(Insert label example)

This mark is not required for any other dangerous goods under air transport regulation.



Some other national and international modal regulations (for example, IMDG for maritime transport and ADR for European road transport) require the additional use of the Environmentally Hazardous Substance mark on a voluntary basis from 1 January 2009 for all dangerous goods which are also classified as pollutants to the aquatic environment. Whilst air transport regulation does not require this mark other than for UN3077 and UN3082, it may be found on packages so that they are in compliance with other modal regulations.

For the purposes of dangerous goods air acceptance by operators, packages with the Environmentally Hazardous Substance mark (with the exception of when used for UN3077 or UN3082) may be ignored during the acceptance process and be accepted for air transport subject to compliance with all other acceptance provisions.

The package marking example shown below is acceptable for air transport.

