



WORKING PAPER

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

Abu Dhabi, United Arab Emirates, 7 to 11 November 2010

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

2.7: Part 7 — Operator's Responsibilities

OBSTRUCTED LABELS AND MARKINGS

(Presented by M. Paquette)

SUMMARY

This paper proposes to add a requirement under Part 7;2 of the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) to ensure that labels and markings remain visible during storage and transport while in the care of the air operator and any ground handling agents acting on its behalf.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 Part 5 of the Technical Instructions specifies that a shipper must ensure that all markings and labels are so placed on the packagings that they are not covered or obscured by any part of or attachment to the packaging or any other label or marking. Under Part 7;1.3.1, an air operator must complete an acceptance check to ensure that:

- c) the marking of the package, overpack or freight container accords with the details stated on the accompanying dangerous goods transport document and are clearly visible;
- d) where required, the letter in the packaging specification marking designating the packing group for which the design type has been successfully tested is appropriate for the dangerous goods contained within. This does not apply to overpacks where the specification marking is not visible;
- e) proper shipping names, UN numbers, labels, and special handling instructions appearing on the interior package(s) are clearly visible or reproduced on the outside of an overpack;
- f) the labelling of the package, overpack or freight container is as required by 5;3;

...

1.2 Even when acceptance checks of packages containing dangerous goods are properly completed, there is evidence of a tendency by various air operators and third parties to add non-dangerous goods related labels or tape over the dangerous goods markings and labels.

1.3 These safety marks relay important information as to the hazard of the contents and the handling restrictions; we believe that air operators and any ground handling agents acting on their behalf must ensure that the dangerous goods markings and labels remain visible at all times during storage and transport.



2. **ACTION BY THE DGP-WG**

2.1 The DGP-WG is invited to consider adding the following paragraph to Part 7;2, Storage and Loading, to ensure that labels and markings remain visible during storage and transport while in the care of the air operator and any ground handling agents acting on its behalf. Subsequent paragraphs would then be renumbered accordingly. The proposed text is as follows:

Part 7

OPERATOR'S RESPONSIBILITIES

...

Chapter 2

STORAGE AND LOADING

...

2.5 DAMAGED PACKAGES OF DANGEROUS GOODS

Where any package of dangerous goods loaded on an aircraft appears to be damaged or leaking, the operator must remove such package from the aircraft, or arrange for its removal by an appropriate authority or organization, and thereafter arrange for its safe disposal. In the case of a package which appears to be leaking, the operator must ensure the remainder of the consignment is in a proper condition for transport by air and that no other package, baggage or cargo has been contaminated. See 3.1 and 3.2 of this Part concerning action to be taken in the event of damage to packages containing infectious substances in Class 6 and radioactive materials in Class 7.

2.6 VISIBILITY OF MARKINGS AND LABELS

While in storage and during transport all required markings and labels must not be covered or obscured by any part of or attachment to the packaging or any other label or marking.

2.67 REPLACEMENT OF LABELS

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

Renumber subsequent paragraphs accordingly.

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