



WORKING PAPER

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

Atlantic City, United States, 4 to 8 April 2011

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

2.3: Part 3 — Dangerous Goods List, Special Provisions and Limited and Excepted Quantities

APPLICATION OF THE Y LIMITED QUANTITY MARK

(Presented by the Dangerous Goods Advisory Council)

SUMMARY

This paper invites the working group to comment on a proposal DGAC has submitted to the 39th session of the UN Subcommittee concerning the application of the “Y” limited quantity mark.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 DGAC has submitted the attached paper to the UN Subcommittee concerning the application of the Y limited quantity package mark when packages are not consigned for air transport.

2. ACTION BY THE DGP-WG

2.1 The WG is invited to concur with the DGAC proposal or comment as appropriate and ask the Secretariat to convey the working group’s views to the UN subcommittee.

APPENDIX

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Secretariat

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**COMMITTEE OF EXPERTS ON THE TRANSPORT OF
DANGEROUS GOODS AND ON THE GLOBALLY
HARMONIZED SYSTEM OF CLASSIFICATION
AND LABELLING OF CHEMICALS**

Sub-Committee of Experts on the
Transport of Dangerous Goods

Thirty-ninth session
Geneva, 20-24 June 2011

Item 5(c) of the provisional agenda

MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS

Application of the Air LQ Mark

Transmitted by the Dangerous Goods Advisory Council¹

1. On the basis of recommendations from the ICAO Dangerous Goods Panel (DGP), the Subcommittee adopted, for the 16th revised edition, the new “Y” limited quantity mark (figure 3.4.2) for packages of limited quantities of dangerous goods which meet the ICAO limited quantity requirements. The new mark and relevant requirements are found in 3.4.8 and 3.4.9 of the Model Regulations. This paper is intended to clarify the conditions under which the new “Y” limited quantity marking may be applied.

¹ In accordance with the programme of work of the Sub-Committee for 2007-2008 approved by the Committee at its third session (refer to ST/SG/AC.10/C.3/60 para. 100 and ST/SG/AC.10/C.3/34, para. 14).

Background

2. At the time new limited quantity requirements were being developed by the Subcommittee, it was recognized that there was potential for confusion when limited quantity packages meeting the ICAO limited quantity requirements were offered for ground transportation. While the ICAO limited quantity packages should in all respects meet the UN limited quantity requirements, the hazard labels and UN number and proper shipping name markings required for air transport could lead road, rail and vessel carriers to assume air limited quantity packages should be treated as fully regulated dangerous goods. To avoid confusion, the ICAO DGP proposed the “Y” limited quantity mark for air limited quantity packages.

3. While avoiding the potential confusion discussed above, the mark raises a new question. Namely, “when not intended for air transport, what provisions must a package comply with in order to legitimately bear the “Y” LQ mark?”

4. Many small packages containing limited quantities of dangerous goods meet the ICAO limited quantity requirements, even though the vast majority are transported by road, rail or vessel. Transport by air is frequently limited to the few occasions where time or the remoteness of the destination warrants the additional air transport expense. Even though the vast majority are not transported by air, many consignors are interested in applying the “Y” LQ mark, in place of the figure 3.4.1 mark, on all such packagings and only applying the ICAO required hazard labels and additional markings on the occasional package being transported by air. In doing so, they avoid having to remark packages with the “Y” limited quantity mark when selected for air transport.

5. While the current text in 3.4.8 requires that a limited quantity package **intended for air transport** must meet all the ICAO limited quantity requirements in Part 3 Chapter 4, the text does not state under what conditions the “Y” limited quantity mark may be placed on a package not intended for air transport. Compliance with ICAO 3;4 entails applying the applicable hazard labels and required markings (e.g., PSN, UN number, and name and address of consignor and consignee). Considering that the “Y” LQ mark was largely proposed to avoid confusion when air limited quantity packages are transported by ground or vessel, DGAC does not believe it was the Subcommittee’s intention to require compliance with ICAO marking and labelling requirements as a condition for applying the “Y” LQ mark on packages that in all other respects (e.g., compliance with relevant ICAO packing instruction, and compliance with the pressure differential requirement for inner packagings containing liquids) meet the ICAO limited quantity requirements but that are not intended for air transport.

Proposal

6. DGAC proposes to revise 3.4.8 to clarify when the “Y” LQ Mark may be applied on packages not intended for air transport by adding a new sentence at the end of the current text, as follows:

“A package not consigned for air transport may bear the marking in Figure 3.4.2 provided it is in conformity with the provisions of the Part 3, Chapter 4 of the ICAO Technical Instructions on the Safe Transport of Dangerous Goods except those pertaining to labelling and marking.”