



WORKING PAPER

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

Montréal, 15 to 19 April 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**
2.5 : Part 5 — Shipper's Responsibilities

CLARIFICATION ON THE APPLICATION OF "LABELS"

(Presented by D. Brennan)

SUMMARY

The working paper proposes a slight revision to Part 5;3 to clarify the requirements applicable to application of labels.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 Much of the text set out in the Technical Instructions is taken directly from the UN Recommendations. This is entirely appropriate as having common text across the international modal instruments ensures harmonized transport provisions for all parts of the supply chain.

1.2 The Technical Instructions does however have a significant difference from the UN when it comes to use of the term "label". A "label" in the UN Recommendations is only used to describe or address hazard labels. All other information applied to packages is done by way of "marks".

1.3 The Technical Instructions though contain requirements for many other labels apart from hazard labels. These include the cargo aircraft only label, orientation arrows, which can be applied as labels, lithium battery handling label, keep way from heat label, and so on.

1.4 In addition, there are a number of items that are described as "marks", but which are produced as labels for ease of application. These include the marks to indicate limited quantities, excepted quantities and environmentally hazardous substances.

1.5 For the most part the Technical Instructions are clear in describing the provisions that apply to hazard labels and those that apply to other types of “labels”. There is though one area where there is a lack of clarity and there has been some debate as to the actual intent and that is the text in Part 5;3.2.8 that sets out the requirements for the placement of hazard labels on packages.

1.6 The text in Part 5;3.2.8 is taken directly from paragraph 5.2.2.1.6 in the UN Recommendations. The text in 5;3.2.8 however only describes “labels” and it could be taken to apply to all labels described in the Technical Instructions. In the UN though by virtue that the term label only applies to hazard labels it is clear that the application provisions described only applies to hazard labels.

1.7 It is therefore proposed to make a small modification to 5;3.2.8 to insert the words “class hazard” to clarify the intent.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to consider amendment of 5;3.2.8 as shown in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENT TO PART 5 OF THE TECHNICAL INSTRUCTIONS

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Part 5

SHIPPER'S RESPONSIBILITIES

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Chapter 3

LABELLING

*Parts of this Chapter are affected by State Variations AU 5, CA 1, CA 4, IT 7,
JP 9, JP 21, PK 2, VC 6, VU 5; see Table A-1*

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3.2.8 Except as provided in 3.5.1.1 d), each class hazard label must:

- a) be affixed to a background of contrasting colour or must have a dotted or solid line outer boundary;
- b) be located on the same surface of the package near the proper shipping name marking, if the package dimensions are adequate;
- c) be so placed on the packaging that they are not covered or obscured by any part of or attachment to the packaging or any other label or marking;
- d) when primary and subsidiary risk labels are required, be displayed next to each other; and
- e) in case of hazard warning labels, be affixed at an angle of 45° (diamond shaped), unless the package dimensions are inadequate.

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