



**WORKING PAPER**

**DANGEROUS GOODS PANEL (DGP)**

**TWENTIETH MEETING**

**Montréal, 24 October to 04 November 2005**

**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 2007-2008 Edition**

**FORMAT OF HAZARD LABELS**

(Presented by J. Abouchaar)

**1. INTRODUCTION**

1.1 At DGP WG/02 a paper (DGP-WG/02-WP/4) was presented identifying that the format of the Class 9 – Miscellaneous dangerous goods hazard label did not align with that in the UN Model Regulations. The paper proposed that the label in the Technical Instructions, although believed to be the correct design, be aligned to that in the Model Regulations.

1.2 The report of DGP WG/02 also identifies that there is a difference in the design of the flammable solid hazard label. A paper addressing this was to be submitted to the next meeting. However, that was not done.

1.3 This matter, while apparently trivial, is starting to cause problems with some agencies and competent authorities challenging packages bearing hazard labels with the ICAO format as being non-compliant.

1.4 A review of all the hazard label designs has identified that in addition to the Division 4.1 and the Class 9 hazard labels, there is also a difference between the design of the Class 8 hazard label shown in the Technical Instructions and that in the UN Model Regulations.

1.5 The differences in each of the hazard labels is as follows:

Label	UN Model Regulations	Technical Instructions
4.1	Last set of vertical red stripes extend right to the outside corner of the hazard label	Red stripes are constant width and there is some 'white' at the extreme corners.
8	Hand is just an outline.	Hand is shaded.
9	No horizontal line delineating the top half of label. Last set of vertical black stripes extend right to the outside corner of the hazard label	Horizontal line delineating the top half of label. Black stripes are constant width and there is some 'white' at the extreme corners.

1.6 Of note is that the label designs shown in the IMDG Code also have differences to those in the UN Model Regulations. For the IMDG Code the Class 8 label has the hand even more obviously shaded than that in the Technical Instructions. There is also a difference in the design of the skull on the Division 2.3 and Division 6.1 label. The IMDG designs for the Division 4.1 and Class 9 label are identical to those in the UN Model Regulations.

1.7 These variations in the detail of the hazard labels have no impact on safety and should not be considered as non-compliance with the regulatory requirements. In addition, there are significant stocks of labels in use in industry and any move to require amendments to the design will create a significant cost to industry without any safety benefit.

1.8 An INF paper will be presented at DGP/20 with actual examples of hazard labels showing these variations.

## 2. PROPOSAL 1

2.1 Add an additional note to Part 5;3.4.1.2 as follows:

*Note 2. — Minor variations in the design of the symbol on hazard labels or other differences such as the width of vertical lines on hazard labels as shown in these Instructions and Regulations of other modes are acceptable. For example the hand shown on the Class 8 label may be shown with or without shading, the extreme right and left vertical lines on the Division 4.1 and Class 9 label may extend to the edge of the label or there may be some white space at the edge, etc.*

## 3. PROPOSAL 2

3.1 If Proposal 1 is accepted that the Secretary submit a paper to the next meeting of the UN Subcommittee proposing a similar amendment to the UN Model Regulations by addition of a note to 5.2.2.2.1 as follows:

*NOTE: The design of the symbol, width of vertical lines and other aspects of the format of labels should conform with those shown in 5.2.2.2.2. However, minor variations in the format of labels as shown in the modal regulations are acceptable.*

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