



WORKING PAPER

DANGEROUS GOODS PANEL (DGP)

TWENTIETH MEETING

Montréal, 24 October to 4 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

"SURFACE" VS. "SIDE"

(Presented by J. Abouchaar)

1. INTRODUCTION

1.1 The Technical Instructions presently sets out a number of requirements regarding the placement of marking and labels, which uses the wording “on the same surface”. This use of the word “surface” is causing some confusion with shippers and operator acceptance personnel when trying to apply or validate the requirement.

1.2 The Concise Oxford dictionary defines ‘surface’ as being “the outside of a material body”. In this context the placement of the hazard label as set out in Part 5;3.2.7 b) does not have to be next to the proper shipping name marking, but rather only somewhere on the outside of the same package. The same applies to the placement of labels in 5;3.2.11 a) 3) and 5;3.2.11 d).

1.3 In each of these the intent of the requirement would appear to be that they should be on the same ‘side’ of the package. Side being defined as “each of the more or less flat surfaces bounding an object (*a cube has six sides*)”.

2. PROPOSAL 1

2.1 Amend Part 5;3.2.7 b) as follows:

- b) be located on the same ~~surface~~ **side** of the package near the proper shipping name, if the package dimensions are adequate;

3. **PROPOSAL 2**

3.1 Amend Part 5;3.2.11 a) 3) as follows:

3) on the same ~~surface~~ side of the package near the hazard labels;

4. **PROPOSAL 3**

4.1 Amend Part 5;3.2.11 d) as follows:

d) for packages containing self-reactive substances of Division 4.1 or Division 5.2 organic peroxides, the “Keep away from heat” label (Figure 5-27) must be affixed on all packages. This label should be affixed on the same ~~surface~~ side of the package near the hazard label(s).

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