



DANGEROUS GOODS PANEL (DGP)

TWENTY-SEVENTH MEETING

Montréal, 16 to 20 September 2019

Agenda Item 2: Managing air-specific safety risks and identifying anomalies

2.2: Develop proposals, if necessary, for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2021-2022 Edition

CLARIFICATION OF APPLYING DANGEROUS GOODS LABELS AND MARKS ON NON-DANGEROUS GOODS PACKAGINGS

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SUMMARY

This paper proposes clarifying whether dangerous goods labels and marks can be applied to packages not containing dangerous goods.

1. INTRODUCTION

1.1 Detailed provisions for labels and marks on dangerous goods packages are included in the Technical Instructions. However, it is unclear whether dangerous goods labels and marks can be applied on the packages which do not contain dangerous goods.

1.2 In order to facilitate handling, some shippers use UN specification packages to transport non-dangerous goods, but because of the UN specification marks on the packagings, the general cargo is often questioned by cargo acceptance staff, security staff, loading staff and crew members during air transport.

1.3 Part 5;1.1 h) of the Technical Instructions refers to the need to remove or obliterate inappropriate dangerous goods labels from a package before being offered for transport by air, i.e.:

- “h) before a package or overpack is reused, all inappropriate dangerous goods labels and marks are removed or completely obliterated;”

1.4 Part 5;2.2.1 of the Technical Instructions stipulates that all marks must be 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 mark.

1.5 In fact, the provisions for shippers described in paragraphs 1.3 and 1.4 are for dangerous goods packages, and there are no regulations on whether dangerous goods labels and marks can be used on non-dangerous goods packages. As a result, some shippers may transport non-dangerous goods in a package with dangerous goods labels and marks on it, which may cause suspicions that dangerous goods are contained within, or with dangerous goods labels and marks covered, which may cause suspicions that hidden dangerous goods are contained within. Quite often, there are misunderstandings between shippers, consignees and even regulators in the absence of mandatory requirements in regulations.

1.6 Note 1 under Part 7;1.1.2 of the Technical Instructions proposes:

“ Note 1.— Diamond-shaped GHS pictograms on packages may indicate the presence of dangerous goods. While some pictograms identify substances that only pose a hazard for supply and use, other GHS pictograms contain symbols that are largely equivalent to the symbols contained in the hazard labels used in transport, and which may therefore be classified as dangerous goods. For more information, see [www. http://www.unece.org/trans/danger/publi/ghs/ghs_welcome_e.html](http://www.unece.org/trans/danger/publi/ghs/ghs_welcome_e.html).”

But there is no provision to clarify that goods packed in packagings with dangerous goods labels and marks may be classified as dangerous goods.

2. **FUTURE WORK**

2.1 The DGP is invited to consider whether there is a need to clarify provisions related to whether dangerous goods labels and marks can be applied on non-dangerous goods packagings.

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