

DANGEROUS GOODS PANEL

Frankfurt, 16 to 20 September 2002

Agenda Item 2: Development of recommendations for amendments to the Technical Instructions for incorporation in the 2005/2006 edition

AFFIXING LABELS TO SMALL PACKAGINGS

(Presented by R. Richard)

1. In 5;3.2.9 the TI authorizes the application of labels using an adequately strong tag when the package is of such an irregular shape that a label cannot be affixed to or printed on a surface. This authorization does not apply when the packaging is too small for the label to be affixed to the surface. This is especially critical for small consumer commodity packagings such as medical kits and surgical instruments that contain small quantities of dangerous goods. Many air carriers refuse shipments if the marks & labels are attached by tags or other suitable means, citing the fact that 5;3.2.9 only allows tags when the packaging is of an irregular shape. There does not appear to be a safety reason for excluding the use of tags for small packagings as long as they are securely affixed. On this basis, it is proposed to amend 5;3.2.9 as follows:

5;3.2.9 Labels must be firmly affixed to or printed on dangerous goods packages. A label may be printed or placed on a package. When the package has such an irregular surface that a label cannot be satisfactorily affixed or the package has dimensions less than those of the required label, the label may be affixed using a securely affixed tag, or be affixed by other suitable means.

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