



**WORKING PAPER**

**DANGEROUS GOODS PANEL (DGP)  
WORKING GROUP MEETING (DGP-WG/16)**

**Montreal, 17 to 21 October 2016**

**Agenda Item 3: Development of recommendations for amendments to the *Supplement to the Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284SU) for incorporation in the 2019-2020 Edition**

**LABELLING AND MARKING OF CLASS 1 DANGEROUS GOODS**

(Presented by D. Mirko)

**SUMMARY**

This paper proposes to allow the State of Origin, when issuing an exemption for carriage of dangerous goods, not to require full compliance with all requirements for labels and markings.

**Action by the DGP-WG:** The DGP is invited to add a new paragraph 3.3.1.15 to the Supplement to the Technical Instructions in Part S-4;3.3 (General Packing Provisions) as shown in the appendix to this working paper.

**1. INTRODUCTION**

1.1 Each package with dangerous goods to be transported by air must comply with all applicable requirements relating to labels and markings.

1.2 The Supplement to the Technical Instructions prescribes that the issuance of an exemption is contingent on ensuring an overall level of safety in transport which is at least equivalent to the level of safety provided for in the Technical Instructions.

1.3 Russian cargo carriers operating flights from various countries worldwide have experienced a regular problem with shippers failing to comply with requirements of the Technical Instructions with regard to placing labels and markings on packages further packed into an overpack.

1.4 In case of large quantities of dangerous goods (usually identical packages containing explosives) arriving from manufacturers, such manufacturers are often not concerned about labelling and

marking of dangerous goods for their transport by air (due to no information on a specific destination and means of transport for their goods as of the date of packing).

1.5 As manufacturers of dangerous goods are typically located in remote areas, such goods are usually carried from remote airports with limited infrastructure to support the proper preparation of the goods for carriage.

1.6 In view of the above, when goods are prepared for carriage, it appears impracticable to fully comply with the Technical Instructions with regard to placing labels and markings on each identical individual package.

1.7 The packages are generally transported in an overpack from an airport of origin to an airport of destination on charter flights operated by all-cargo aircraft with a minimum risk of being exposed to mixed airport handling procedures.

## 2. ACTION BY THE DGP-WG

2.1 The DGP is invited to add a new paragraph 3.3.1.15 to the Supplement to the Technical Instructions Part S-4;3.3 as shown in the appendix to this working paper.

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APPENDIX

PROPOSED AMENDMENT TO PART S-4 OF THE SUPPLEMENT

Part S-4

PACKING INSTRUCTIONS

(ADDITIONAL INFORMATION  
FOR PART 4 OF THE  
TECHNICAL INSTRUCTIONS)

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Chapter 3

CLASS 1 — EXPLOSIVES

3.1 LARGE AND ROBUST ARTICLES

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3.3 GENERAL PACKING PROVISIONS

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3.3.1.15 When articles are placed into and transported in an overpack from their acceptance at an airport of origin to their delivery at an airport of destination, the requirements of Part 5 – Shipper's Responsibilities, Chapter 2 and Chapter 3 of the Technical Instructions may be waived for each individual package placed in an overpack. However, the provisions of Part 5, paragraphs 2.4.10 and 3.3 of the Technical Instructions for marking and labelling of overpacks must be observed.

Note. — Provisions of 3.3.1.15 apply only to goods transported on cargo charter flights.

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