



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

**Montreal, 17 to 21 October 2016**

**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 2019-2020 Edition**

**2.5: Part 5 — Shipper's Responsibilities**

**COVERING OF MARKS AND REMOVAL OF LABELS**

(Presented by B. Carrara)

**REVISED**

**SUMMARY**

This working paper invites the DGP-WG to discuss a possible lack of a requirement to remove or cover labels which do not relate to the contents in situations where there are no dangerous goods been transported. The working group is also invited to consider the suggested amendment presented in the appendix to this working paper.

**Action by the DGP-WG:** The DGP-WG is invited to discuss the current requirements for removing labels which do not relate to the contents and to consider amending the Technical Instructions as proposed in the appendix to this working paper.

**1. INTRODUCTION**

1.1 Experience in conducting dangerous goods inspections has shown that sometimes operators do not reject cargo not classified as dangerous goods when it presents any dangerous goods labels which do not relate to the contents.

1.2 As described in Part 7;6.1, dangerous goods labels may be an indication that dangerous goods are present in a package. Despite being a false alert, the untrue hazard communication about the presence of dangerous goods inside a package could cause confusion in the transport chain and also reduce the importance of communication to the safe transport of dangerous goods.

1.3 Part 7;2.8.5 requires that the identification tag must be removed from the unit load device (ULD) immediately after the dangerous goods have been unloaded. In the same way, Part 5;3.6.1.1 requires any placards which do not relate to the contents to be removed.

1.4 Specifically for Division 6.2, Packing Instruction 620 requires the removal or obliteration of any label or marking indicating an empty packaging contained an infectious substance but that had been disinfected or sterilized to nullify any hazard.

1.5 Similarly, Part 5;3.2.6 states that any labels which do not relate to the contents must be removed or covered. However, this paragraph seems to be applicable to packages, overpacks and freight containers containing radioactive material only, especially because the original text in the UN Model Regulations (5.2.2.1.12.1), different than the Technical Instructions, presents the heading “Special provisions for the labelling of radioactive material’.

1.6 The general requirements of Part 5;1.1 h) establish that a person must ensure that, before a package or overpack is reused, all inappropriate dangerous goods labels and markings are removed or completely obliterated. However, this is applicable only when this person offers a package or overpack of dangerous goods.

1.7 Research was made to try to find any other paragraph that would require operators or shippers to remove or to cover dangerous goods hazard labels that did not represent the real content of the package, especially when there had been no dangerous goods offered in the package, but it does not exist in the Technical Instructions.

1.8 The most suitable requirement is the one shown in Part 5;1.1 h), but we understand it is only applicable when dangerous goods have been offered. The other possibility might be in Part 5;3.2.6 but we believe it is only applicable to radioactive material labels. Also, both situations are only applicable to shippers, since the responsibilities are included in Part 5, which means the operator does not have responsibilities required in the Technical Instructions to verify the presence of labels and marks that do not relate to the contents.

1.9 Having presented that, this paper invites the working group to discuss their understanding on this issue.

## 2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to:

- a) discuss a possible lack of a requirement to remove or cover labels which do not relate to the contents in situations where there are no dangerous goods being transported; and
- b) consider the suggested amendment presented in the appendix to this working paper.

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APPENDIX

PROPOSED AMENDMENT TO PART 5 OF THE TECHNICAL INSTRUCTIONS

Part 5

SHIPPER'S RESPONSIBILITIES

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Chapter 3

LABELLING

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3.2 APPLICATION OF LABELS

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3.2.6 Except when enlarged labels are used in accordance with 3.6, each package, overpack and freight container containing radioactive material must bear the labels conforming to Figures 5-20, 5-21 and 5-22 according to the appropriate category. Labels must be affixed to two opposite sides on the outside of the package or overpack or on the outside of all four sides of a freight container. Each overpack containing radioactive material must bear at least two labels on opposite sides of the outside of the overpack. In addition, each package, overpack and freight container containing fissile material, other than fissile material excepted under the provisions of 2.7.2.3.5 must bear labels conforming to the model shown in Figure 5-23; such labels, where applicable, must be affixed adjacent to the labels conforming to Figure 5-20, 5-21, or 5-22, as applicable. Labels must not cover the marks specified in Chapter 2. ~~Any labels which do not relate to the contents must be removed or covered.~~

3.2.7 Any labels which do not relate to the contents must be removed or covered.

3.2.7<sup>8</sup> Intermediate bulk containers must comply with the labelling requirements applicable to other packagings, except that intermediate bulk containers of more than 450 L capacity must be labelled on two opposite sides.

3.2.8<sup>9</sup> Except as provided in 3.5.1.1 b), each class hazard label must:

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*Renumber all paragraph numbers to reflect new paragraph 3.2.7.*

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