



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/17)**

Montreal, 24 to 28 April 2017

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

LABELS NOT RELATED TO THE CONTENTS

(Presented by B. Carrara)

SUMMARY

This working paper invites the DGP-WG to discuss the need for possible clarification of a requirement to remove or cover labels which do not relate to the contents of a package. 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 is invited to discuss the current requirements for removing labels which do not relate to the contents of a package and to consider amending the Technical Instructions as proposed in the appendix to this working paper.

1. INTRODUCTION

1.1 Part 5;3.2.6 states that any labels which do not relate to the contents must be removed or covered. However, this paragraph can be interpreted to be applicable to packages, overpacks and freight containers containing radioactive material only.

1.2 Although this requirement is written in a paragraph with content predominantly about radioactive material, it is reasonable for it to apply to all dangerous goods labels.

1.3 Removal of information that causes wrong identification regarding the content during transport is found in other requirements in Technical Instructions:

- a) identification tag — 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.
- b) placards — Part 5;3.6.1.1 requires any placards which do not relate to the contents to be removed.
- c) marks and labels of 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.

1.4 Considering the above, this proposal suggests removing the last phrase of Part 5;3.2.6 and reallocating it to an independent requirement of 3.2 that refers to the application of labels so it would not be restricted only to radioactive materials.

1.5 An amendment is needed to emphasize that not only hazard labels but also handling labels, except for package orientation labels (Figure 5-29), should be removed or covered when the label does not relate to the contents.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to consider the suggested amendment presented in the appendix to this working paper.

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 class hazard label and handling label which does not relate to the contents must be removed or covered, except for package orientation labels (Figure 5-29).

3.2.7~~8~~ 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.

Renumber subsequent paragraphs accordingly

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