

**Sub-Committee of Experts on the
Transport of Dangerous Goods**

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**GLOBAL HARMONIZATION OF SYSTEMS OF CLASSIFICATION
AND LABELLING OF CHEMICALS**

**Hazard communication
Non-transport hazard communication label**

Submitted by the International Air Transport Association (IATA)

Background

The International Airline Association (IATA) would like to express its concern about a proposal under consideration by the ILO - Working Group on Hazard Communication in regard to labeling substances that are not subject to the model regulations of the United Nations Regulations on the Transport of Dangerous Goods (UN RTDG).

The diamond (square on point) shape label has up to now been considered the exclusive domain of the transport of dangerous goods Regulations. In fact, several National and International transportation regulations (ICAO part 5, paragraph 3.2.1.3, IATA, paragraph 7.2.9) prohibits the use of labels on the exterior of a package that, "by their color, design or shape could be confused with or conflict with a label prescribed by the applicable transportation Regulations.

The primary concerns of the air carriers is the problem of a package that does not meet the UNRTDG transport criteria but does meet the GHS criteria and would still have GHS diamonds on the outside package when in transport. To illustrate the point, the airline considered the example of a substance that meets the acute TOST criteria and bears a skull and cross bones pictogram with a red border (or a black border as permitted for domestic use).

The majority of aircraft incidents involving dangerous goods are the result of undeclared items. Out of concern for the dangers posed by undeclared dangerous goods being transported on aircraft, several States authorities are putting more pressure on the air carriers to pay additional attention to packages that look suspicious. There have been recent fines of up to USD 25,000 when an air carrier failed to recognize that an unlabelled package did in fact contain dangerous goods regulated in air transport as the carrier, by examining other markings on the package, could have recognized this.

Training of employees in air carrier companies and other transport companies has focused on label identification to facilitate a rapid identification of transport hazards. For example, workers are instructed that packages displaying a diamond label are to be stopped until and unless they are found to have documentation authorizing their transport. Workers in air operators are further instructed to watch for other clues and to challenge any package that exhibits indicators that could reasonably be interpreted to suggest the presence of dangerous goods.

When one considers large sorting centers that handle something like 3 million packages a day, where chemists are not doing the sorting and personnel turn over is high, instructions need to be simple. Right now the instructions are to question anything with a diamond shaped pictogram. There will probably be a lot more packages that don't meet the UNRTDG criteria but do meet the GHS criteria as compared to packages that meet the UNRTDG criteria. If each of these is stopped and questioned in a sort center one can easily imagine the kind of back up and confusion that that could cause.

IATA and its Members airlines can well understand the laudable goal to coordinate hazard classification standards among the disciplines of consumer safety, worker safety and transportation. However, we do not support the proposals to apply square set-on-point labels to packages for purposes other than communication of transport hazards under the UN RTDG. Proposal as we consider there is a better way to achieve the above goal.

Proposal

It is proposed that the ILO Working Group on hazard communication adopt a labeling scheme for substance that are not subject to the Model Regulations of the United Nations on the Transport of Dangerous Goods (UN RTDG) which will not create confusion in the transportation chain.

A label in the shape of a square (*favored*), triangle or circle containing the familiar hazard symbols (e.g. Skull with cross-bones etc) will perfectly serve this purpose. The hazard symbol appearing on the label will achieve the goal referred to above and ensure continuity in approach while, the difference in shape from the transportation label will provide, enough differentiation to avoid confusion and help in training.