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**Committee of Experts on the Transport of Dangerous Goods  
and on the Globally Harmonized System of Classification  
and Labelling of Chemicals****Sub-Committee of Experts on the Transport of Dangerous Goods****Thirty-ninth session**

Geneva, 20–24 June 2011

Item 5 (c) of the provisional agenda

**Miscellaneous proposals of amendments to the Model Regulations  
on the Transport of Dangerous Goods: marking and labelling****Application of the air LQ mark****Transmitted by the Dangerous Goods Advisory Council<sup>1</sup>**

1. On the basis of recommendations from the ICAO Dangerous Goods Panel (DGP), the Sub-Committee adopted, for the sixteenth revised edition of the Recommendation on the Transport of Dangerous Goods, Model Regulations, the new “Y” limited quantity mark (figure 3.4.2) for packages of limited quantities of dangerous goods which meet the ICAO limited quantity requirements. The new mark and relevant requirements are found in 3.4.8 and 3.4.9 of the Model Regulations. This paper is intended to clarify the conditions under which the new “Y” limited quantity marking may be applied.

**Background**

2. At the time new limited quantity requirements were being developed by the Sub-Committee, it was recognized that there was potential for confusion when limited quantity packages meeting the ICAO limited quantity requirements were offered for ground transportation. While the ICAO limited quantity packages should in all respects meet the UN limited quantity requirements, the hazard labels and UN number and proper shipping name markings required for air transport could lead road, rail and vessel carriers to assume air limited quantity packages should be treated as fully regulated dangerous goods. To avoid confusion, the ICAO DGP proposed the “Y” limited quantity mark for air limited quantity packages.

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

3. While avoiding the potential confusion discussed above, the mark raises a new question. Namely, “when not intended for air transport, what provisions must a package comply with in order to legitimately bear the “Y” LQ mark?”

4. Many small packages containing limited quantities of dangerous goods meet the ICAO limited quantity requirements, even though the vast majority are transported by road, rail or vessel. Transport by air is frequently limited to the few occasions where time or the remoteness of the destination warrants the additional air transport expense. Even though the vast majority are not transported by air, many consignors are interested in applying the “Y” LQ mark, in place of the figure 3.4.1 mark, on all such packagings and only applying the ICAO required hazard labels and additional markings on the occasional package being transported by air. In doing so, they avoid having to remark packages with the “Y” limited quantity mark when selected for air transport.

5. While the current text in 3.4.8 requires that a limited quantity package **intended for air transport** must meet all the ICAO limited quantity requirements in Part 3 Chapter 4, the text does not state under what conditions the “Y” limited quantity mark may be placed on a package not intended for air transport. Compliance with ICAO 3;4 entails applying the applicable hazard labels and required markings (e.g., Proper Shipping Name, UN number, and name and address of consignor and consignee). Considering that the “Y” LQ mark was largely proposed to avoid confusion when air limited quantity packages are transported by ground or vessel, DGAC does not believe it was the Subcommittee’s intention to require compliance with ICAO marking and labelling requirements as a condition for applying the “Y” LQ mark on packages that in all other respects (e.g., compliance with relevant ICAO packing instruction, and compliance with the pressure differential requirement for inner packagings containing liquids) meet the ICAO limited quantity requirements but that are not intended for air transport.

## Proposal

6. DGAC proposes to revise 3.4.8 to clarify when the “Y” LQ Mark may be applied on packages not intended for air transport by adding a new sentence at the end of the current text, as follows:

“A package not consigned for air transport may bear the marking in Figure 3.4.2 provided it is in conformity with the provisions of the Part 3, Chapter 4 of the ICAO Technical Instructions on the Safe Transport of Dangerous Goods except those pertaining to labelling and marking.”

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