

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

22 November 2018

Sub-Committee of Experts on the Transport of Dangerous Goods

Fifty-fourth session

Geneva, 26 November-4 December 2018

Item 3 of the provisional agenda

Global harmonization of transport of dangerous goods regulations with the Model Regulations

Recommendations made by the ICAO Dangerous Goods Panel

Submitted by the International Civil Aviation Organization (ICAO)

Background

1. The Dangerous Goods Panel met as a working group from 1 to 5 October 2018 at ICAO Headquarters in Montréal (DGP-WG/18). Among its discussions was a proposal to clarify the provisions for an exception from the minimum height requirement for the UN number and the letters “UN” in the Technical Instructions, which aligns with 5.2.1.1 of the Model Regulations. While it was considered clear that the lower height limit applied to packages of 30 litres capacity or less, whether it applied to packagings of less than 30 kg maximum net mass or to cylinders of less than 60 litres water capacity was not clear. An amendment was proposed to clarify the intent. Recognizing that the provision was based on 5.2.1.1 of the Model Regulations, DGP-WG/18 concluded that any revision would need to first be reviewed by the Sub-Committee and adopted by the Committee of Experts. DGP-WG/18 requested the Secretary to bring the proposed amendment to the attention of the Sub-Committee in an informal document, as the deadline date for submission of working papers had passed before the DGP met. Recognizing that it is purely an editorial amendment, DGP questioned if the Sub-Committee might deem it appropriate to adopt the amendment for incorporation in the 21st revised edition of the Model Regulations. If agreed, corresponding amendments to 6.1.3.1 and 6.3.4.1 would need to be made.

Amendment proposed

5.2.1 Marking

5.2.1.1 Unless provided otherwise in these Regulations, the proper shipping name for the dangerous goods as determined in accordance with 3.1.2 and the corresponding UN number preceded by the letters “UN”, shall be displayed on each package. The UN number and the letters “UN” shall be at least 12 mm high, except for packages of 30 litres capacity or less or of 30 kg maximum net mass and for cylinders of 60 litres water capacity or less when they shall be at least 6 mm in height and except for packages of 5 litres capacity or less or of 5 kg ~~or less~~ maximum net mass when they shall be of an appropriate size. In the case of unpackaged articles the mark shall be displayed on the article, on its cradle or on its handling, storage or launching device. For goods of Division 1.4, Compatibility Group S, the division and compatibility group letter shall also be marked unless the label for 1.4S is displayed. A typical package mark is:

6.1.3.1 Each packaging intended for use according to these Regulations shall bear marks which are durable, legible and placed in a location and of such a size relative to the packaging as to be readily visible. For packages with a gross mass of more than 30 kg, the marks or a duplicate thereof shall appear on the top or on a side of the packaging. Letters, numerals and symbols shall be at least 12 mm high, except for packagings of 30 litres capacity or less or of 30 kg ~~capacity or less~~ maximum net mass, when they shall be at least 6 mm in height and except for packagings of 5 litres capacity or less or of 5 kg ~~or less~~ maximum net mass when they shall be of an appropriate size.

6.3.4.1 Each packaging intended for use according to these Regulations shall bear marks which are durable, legible and placed in a location and of such a size relative to the packaging as to be readily visible. For packages with a gross mass of more than 30 kg, the marks or a duplicate thereof shall appear on the top or on a side of the packaging. Letters, numerals and symbols shall be at least 12 mm high, except for packagings of 30 litres capacity or less or of 30 kg ~~capacity or less~~ maximum net mass, when they shall be at least 6 mm in height and except for packagings of 5 litres capacity or less or of 5 kg ~~or less~~ maximum net mass when they shall be of an appropriate size.
