

Guidance on Hazard Labels Thickness of 2 mm Line not subject to Acceptance Check

(an email from David Brennan, Assist. Director, Cargo Safety and Standards, IATA)

From: BRENNAN Dave <brennand@iata.org>
Date: March 27, 2018 at 20:35:41 GMT+9
Subject: Guidance on Hazard Labels - 2 mm Line

Dear all,

As it is now well documented that the UN Subcommittee and the ICAO Dangerous Goods Panel have determined that the thickness of the line on hazard labels has no bearing on safety, and the provisions in the ICAO Technical Instructions and IATA DGR will formally remove reference to the thickness of the line on hazard labels with effect 1 January 2019, please find attached a guidance document advising that the dangerous goods acceptance check should not consider the thickness of the line.

Please distribute this guidance to your contact as you see fit. This document will be posted on the IATA website and also on the DG Community.

Regards,

Dave

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Guidance Document – Specification of Hazard Labels

Introduction

Paragraph 7.2.2.3.2(a) in the 59th edition of the DGR sets out the specification for hazard labels, which reads:

7.2.2.3.2 Hazard labels must conform to the following specifications:

- (a) labels must be configured as shown in Figure 7.3.A. The label must be in the form of a square set at an angle of 45° (diamond shaped). Except as provided in 7.2.2.3.1, the minimum dimensions must be 100 × 100 mm and the minimum width of the line inside the edge forming the diamond must be 2 mm. The line inside the edge must be parallel and 5 mm from the outside of that line to the edge of the label. The line inside the edge on the upper half of the label the line must be the same colour as the symbol and the line inside the edge on the lower half of the label must be the same colour as the class or division number in the bottom corner. Where dimensions are not specified, all features must be in approximate proportion to those shown.

This text was adopted into the 56th edition of the DGR with a two-year transition period for the design of hazard labels to be brought to this specification. This change, requiring a line with a minimum width of 2 mm, originated with the UN Model Regulations and was expected to be applied across all the modal regulations over the same timeframe. However, the European Agreement Concerning the International Transport of Dangerous Goods by Road (ADR) in the 2017 – 2018 edition delayed implementation of the 2 mm minimum thickness line until 30 June 2019.

This, and delayed adoption of the revised specification for hazard labels into many national regulations has meant that it has largely only been air transport where there has been a requirement for hazard labels with the 2 mm line. To address this, a working paper was submitted to the July 2017 meeting of the UN Subcommittee seeking revision to the specification of the hazard label to remove the requirement for the line to be a minimum of 2 mm in thickness on the basis that there was no safety basis for this level of specificity.

The UN Subcommittee agreed with the proposal, and consequently the requirement for the 2 mm minimum thickness line will be deleted from the regulations with effect 1 January 2019. Based on the change adopted by the UN, the ICAO DGP has modified the specification of hazard labels to remove the requirement from the 2019-2010 edition of the Technical Instructions recognizing that the width of a line on a label does not impact on safety.

Action

Until the provisions of the DGR 7.2.2.3.2(a) are formally changed the dangerous goods acceptance check should not consider the thickness of the line and instead any variation should be treated as a minor variation in accordance with Note 2 under 7.2.2.3.1 which reads as follows:

Minor variations in the design of the symbol on labels or other differences such as the width of vertical lines on labels as shown in these Regulations or in regulations of other modes, which do not affect the obvious meaning of the label, are acceptable. For example, the hand shown on the Class 8 label may be shown with or without shading, the extreme right and left vertical lines on the Division 4.1 and Class 9 label may extend to the edge of the label or there may be some white space at the edge, etc.