

IATA is planning to issue an Addendum to the 56 Edition DGR shortly in which IATA intends to correct printing errors as well as to clarify some of the vague interpretations.

1) Specification on the design of hazard labels:

The 56th Edition, based on revisions to the 18th revised edition of the UN Model Regulations and the 2015-2016 ICAO Technical Instructions, provides for greater specificity on hazard label design, in particular the requirement that the width of the line forming the edge of the diamond must be 2mm in width.

There is existing test in the Technical Instructions and the DGR that allows for minor variations in the design, such as the width of lines. As such, a hazard label with a line of less than 2mm is seen as being quite acceptable and dangerous goods consignments should not be rejected for not having a hazard label with a line of less than 2mm.

However, to clarify, the application the addendum to the 56th edition, which will be released very early in the new year will include a note under 7.2.3.3.2 (a) to clarify that existing hazard labels are acceptable.

2) Relaxation from the application of EHS marks (dead fish and tree mark):

The 2013 edition of the ICAO Technical Instructions and the 2014 IATA DGR, in 7.1.5.3.1 includes a specific allowance for packages containing UN 3077 or UN 3082 not to bear the EHS mark where the net quantity in any receptacle does not exceed 5L or 5kg.

This text was deleted from the 2015 regulations based on changes to the UN Model Regulations which brought in a new special provision 375 (SP A197) that allowed these quantities of EHS to be shipped as “Not Restricted”.

However, discussions at both the ICAO Dangerous Goods Panel Working Group and subsequently at the UN Subcommittee have clarified that the application of Special Provision 375 (SP A197) is permissive and as such, shippers can, if desired still ship quantities of EHS that meet the allowance of special provision as dangerous goods, UN 3077 or UN 3082.

As such there has been a question about the relaxation from the application of the EHS mark on package and whether that still applies. There has been correspondences between the Secretary of the ICAO DGP and the Secretary of the UN Subcommittee to seek some confirmation on how best to proceed. It appears to

be IATA's recommendation that shipments of UN 3077 or UN 3082 accepted after 1 January 2015 should not be rejected for the absence of the EHS mark on packages, unless it is obvious by the contents of the package that the net quantity exceeds 5L or 5kg.

Nothing More