

**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

16 June 2011

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

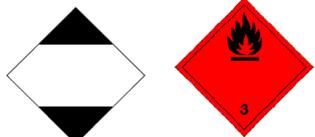
**Comments on document ST/SG/AC.10/C.3/2011/18 transmitted by the
expert of Switzerland**

1. We welcome the document of DGAC stressing the uncertainty regarding the applicable rules for limited quantities (LQ) markings. We would like to suggest the following ideas to the experts of the DGAC and to the UN-Experts. The way the proposal of DGAC has been formulated is a good source of inspiration for further development of these rules. Let us explain some of those hereafter.

2. We understand the problem raised but we are reluctant to add more text in an already confused matter. Under 5. of the DGAC document it is said that the "Y" was added in order to "avoid confusion when air limited quantity packages are transported by ground or vessel". On the contrary the "Y" was added in order to identify for the purposes of air transport alone those packages being in conformity with Part 3 Chapter 4 of the ICAO rules.

3. The proposal of DGAC forbids for land and sea transport in the case of a consignment bearing the "Y" the use of other marking and labelling except the one in Fig. 3.4.2.

4. Besides the fact that the marking in 5.2.1.7 should also remain applicable for other modes, we wonder if this prohibition of other marking and labelling in the case of carriages following chapter 3.4 should not be a general rule for other modes. At least for road transport it is very often interpreted in that way and consignments bearing both kind of markings as shown below are in the most cases subject to fines

Marking	Interpretation
	<p>The presence of Dangerous goods labels could lead to ask for compliance with all dangerous goods rules on landtransport</p>

5. If this approach would be acceptable then the sentence proposed by DGAC could be simplified as follows:

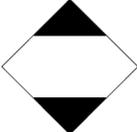
“A package consigned for transport by sea, road, railway and inland waterways may not bear other marks and labels as those in Figure 3.4.1 or in Fig 3.4.2, and in 5.2.1.7.”

6. If this approach would be accepted. Then going a step forward we could consider that: if the "other" markings were effectively not allowed for other modes except for the air mode, then the distinction between packages dedicated to the air mode could be achieved only by the presence of this "other" labelling and marking, that is the dangerous goods labels. In that case, what is the need of having in addition the "Y" mark for the air mode. Because not only the labels but also the presence of the Shipper's Declaration of Dangerous Goods distinguishes air mode carriages of limited quantities. Is there a need to have three different sources of information in order to distinguish air mode packages in limited quantities from the other ones: labels conforming to chapter 5.2, Shipper's Declaration conforming to 5.4 and additionally a special mark with the "Y"?

7. Under the DGAC approach (labels are not allowed for not air transport) then we can renounce to the mark in 3.4.8 and use only one mark, the one in 3.4.7 but maintaining the following text in 3.4.8: "

"Packages containing dangerous goods consigned for air transport shall be in conformity with the provisions of Part 3, Chapter 4 of the ICAO Technical Instructions for the Safe Transport of Dangerous Goods."

8. We believe that this will solve many doubts by controls. The two remaining options are shown hereafter.

Marking	Interpretation
	LQ in other modes
	LQ for air transport