Labelling and placarding requirements for
Freight Containers used as packaging

Issue

In case the freight container is used as packaging do placarding requirements for freight containers apply or are the labelling requirements for packagings sufficient?

Discussion

Para. 531 and 532 of SSR-6_2012 Edition

MARKING, LABELLING AND PLACARDING

531. Each package shall be legibly and durably marked on the outside of the packaging with an identification of either the consignor or consignee, or both. Each overpack shall be legibly and durably marked on the outside of the overpack with an identification of either the consignor or consignee, or both, unless these markings of all the packages within the overpack are clearly visible.

532. Each package shall be legibly and durably marked on the outside with the UN marking as specified in Table 9. Additionally, each overpack shall be legibly and durably marked with the word “OVERPACK” and the UN marking as specified in Table 9 unless all the markings of the packages within the overpack are clearly visible.

533. Each package of gross mass exceeding 50 kg shall have its permissible gross mass legibly and durably marked on the outside of the packaging.

534. Each package that conforms to:
   (a) An IP-1, IP-2 or IP-3 design shall be legibly and durably marked on the outside of the packaging with “TYPE IP-1”, “TYPE IP-2” or “TYPE IP-3”, as appropriate.
   (b) A Type A package design shall be legibly and durably marked on the outside of the packaging with “TYPE A”.
   (c) An IP-2, IP-3 or a Type A package design shall be legibly and durably marked on the outside of the packaging with the international vehicle registration code (VRI code) of the country of origin of design and either the name of the manufacturer or other identification of the packaging specified by the competent authority of the country of origin of design.

Para. 538 and 539 of SSR-6_2012 Edition

Labelling

538. Each package, overpack and freight container shall bear the labels conforming to the applicable models in Figs 2–4, except as allowed under the alternative provisions of para. 543 for large freight containers and tanks, according to the appropriate category. In addition, each package, overpack and freight container containing fissile material, other than fissile material excepted under the provisions of para. 417, shall bear labels conforming to the model in Fig. 5. Any labels that do not relate to the contents shall be removed or covered. For radioactive material having other dangerous properties, see para. 507.

539. The labels conforming to the applicable models in Figs2–4 shall be affixed to two opposite sides of the outside of a package or overpack or on the outside of all four sides of a freight container or tank. The labels conforming to the model in Fig. 5, where applicable, shall be affixed adjacent to the labels

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*a Comments may be provided to the Secretary of FCWG Chris Jones Christopher.Jones@onr.gov.uk
*b FCWG is a group of representatives of the Transport Technical Expert Group on Operational Matters
conforming to the applicable models in Figs 2–4. The labels shall not cover the markings specified in paras 531–536.

Para. 543 and 539 of SSR-6, 2012 Edition

Placarding

543. Large freight containers carrying packages other than excepted packages, and tanks shall bear four placards that conform to the model given in Fig. 6. The placards shall be affixed in a vertical orientation to each side wall and to each end wall of the large freight container or tank. Any placards that do not relate to the contents shall be removed. Instead of using both labels and placards, it is permitted, as an alternative to use enlarged labels only, where appropriate, as shown in Figs 2–4, except having the minimum size shown in Fig. 6.

As per FCWG-02 (Revision 0), a loaded freight container used as packaging is classified as a “package”. Hence, marking and labelling requirements for package shall be complied with.

From the intent of the SSR-6, no placard is required to be affixed to a loaded freight container used as packaging. In case certain modal regulations require placarding for a freight container shaped consignment, an alternative in para. 543 to use enlarged labels instead of placards may work.

Key Message (Summary)

From the regulatory point of view, a loaded freight container used as packaging is classified as package, and shall be marked and labelled as required in SSR-6, and no placarding is required. In practical operations enlarged labels as specified in para. 543 of SSR-6 may helpful.

Note 1: To avoid confusion in practical operation, it should be clearly stated in SSR-6, if the intention of the Regulations is so.

Note 2: In SSR-6 (Rev.1) 2018 Edition, large freight containers carrying unpackaged LSA-I material or SCO-I are required placarding under para. 543 revised.

Comments to Key Message

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<th>No.</th>
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<td>1</td>
<td>1 May, 2019</td>
<td>CNSC/Canada</td>
<td>Not supportive of key message: “For a freight container used as packaging, Table 7 in SSR-6 would apply, and the freight container, regardless of whether it is used as a package or freight container only, would have to be both labelled and placarded.”</td>
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Consultation Opportunities

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<td>May, 2019</td>
<td>FCWG</td>
<td>Discussions completed: One objection made by CNSC.</td>
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<tr>
<td>2</td>
<td>June 2019</td>
<td>TTEG-OM members</td>
<td>Paper is being circulated for comment.</td>
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<tr>
<td>3</td>
<td>26 June 2019</td>
<td>TRANSSC 38</td>
<td>Paper is to be circulated for comment.</td>
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Comments may be provided to the Secretary of FCWG Chris Jones Christopher.Jones@onr.gov.uk.

Revision

<table>
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<td>0</td>
<td>30 May, 2019</td>
<td>Makoto Hirose</td>
<td>For discussion in FCEG/TTEG-OM to prepare answer to the inquiry from ICAO_DGP-WG/16-WP/10</td>
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