

RDIMS # 10188654 TP 9554E

Transportation of Dangerous Goods

TDG Bulletin

Dangerous Goods Safety Marks





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This Bulletin explains the labelling and placarding requirements of the Transportation of Dangerous Goods (TDG) Regulations. It does not change, create, amend or suggest deviations from the TDG Regulations. For specific details, consult Part 4 of the TDG Regulations.

Overview

<u>Part 4</u> of the *TDG Regulations* requires dangerous goods safety marks to be displayed on a means of containment containing dangerous goods in transport.

A dangerous goods safety mark can be a design, symbol, device, sign, label, placard, orange panel, letter, word, number or abbreviation, or any combination of these things.

Dangerous goods safety marks are displayed on a means of containment to identify dangerous goods and to show the nature of the danger they pose.

Dangerous goods safety marks give a quick identification of dangerous goods in the event of an emergency situation such as an accident or an accidental release of dangerous goods from a means of containment.

Dangerous goods safety marks are also an awareness tool for people involved in transportation, including truck drivers, train crews, loading dock workers, reception personnel at a lab or a hospital and aircraft loading personnel.

This Bulletin has been divided into eight parts:

- Consignor and Carrier Responsibilities
- General Requirements
- Labels
- Placards
- Other Safety Marks Marks and Signs
- Misleading Safety Marks
- International Shipments
- Contact Information



Consignor and Carrier Responsibilities

As a consignor, what are my responsibilities?

Before importing dangerous goods, or allowing a carrier in Canada to take possession of dangerous goods for transport, you must:

- Display or ensure the display of the required safety marks on each small and large means of containment that contain dangerous goods; and
- Provide the carrier with the safety marks for the dangerous goods that you
 are offering for transport or importing and that are to be transported in a
 large means of containment.

Exception: You are not required to provide the safety marks if the correct safety marks are already displayed on the large means of containment or the safety marks are not the correct ones to display because of the presence of other dangerous goods in the large means of containment.

Typically, when you provide the large means of containment, you are responsible for displaying the safety marks. However, if the carrier provides the large means of containment, you must provide the carrier with the appropriate safety marks and the carrier will then display them.

Note: A consignor means a person in Canada who is named in a shipping document as the consignor, or who imports or who will import dangerous goods into Canada, or who has possession of dangerous goods immediately before they are in transport (if neither of the first two points apply).

As a carrier, what are my responsibilities?

As a carrier, you are the person who has possession of the dangerous goods while they are in transport. With respect to safety marks, you must:

- Display the required safety marks on the large means of containment, unless they are already displayed on it;
- Ensure that the required safety marks remain displayed on the small and large means of containment while the dangerous goods are in transport; and
- Provide and display, or remove, the safety marks if the requirements for the safety marks change while the dangerous goods are in transport.



Who is responsible for removing or changing dangerous goods safety marks?

When the conditions that required the display of dangerous goods safety marks change, the person having the charge, management or control of the means of containment must determine whether the dangerous goods safety marks must be changed or removed.

In addition, the person who neutralizes the contents of the means of containment or who unloads, unpacks, cleans or purges the means of containment must cover or remove the dangerous goods safety marks when the danger is no longer present in the means of containment.

Note: When the DANGER placard is permitted to be displayed on a large means of containment, a person may continue to display that placard, in place of any other placard, until the large means of containment no longer contains any of the dangerous goods identified by that placard. The use of the DANGER placard is explained on page 9.

General Requirements

What are the general requirements for dangerous goods safety marks?

Dangerous goods safety marks must be:

- Visible*,
- Legible.
- Displayed against a background of contrasting colour,
- Made of durable, weather-resistant material that will resist detachment or deterioration in the conditions they will be exposed to, and
- Displayed in the appropriate colour (safety marks must not be faded).

*In accordance with section 4.15.4, when a large means of containment with dangerous goods safety marks is inside another large means of containment and those safety marks are **not visible**, the safety marks must be displayed on the outer large means of containment. This includes placards, labels and UN numbers.

What is the orientation and size of labels and placards?

Labels and placards are diamond shaped (also referred to as a square on point) and must be displayed as illustrated below. They are often identical (except for



the size) and they communicate the degree and nature of danger of the dangerous goods by colour, number and symbol.



Due of the size or irregular shape of certain means of containment, the TDG *Regulations* allow for the reduction of labels to 30 mm per side and placards to 100 mm per side. The only exception is for Class 7, Radioactive Materials.

Generally, labels are displayed on small means of containment (capacity less than or equal to 450 L) and placards are displayed on large means of containment (capacity greater than 450 L).

For example, labels would be displayed on a box, while a placard would be displayed on a truck carrying the box.



Misleading Safety Marks

When is a safety mark considered to be misleading?

A person must not display a prescribed safety mark on a means of containment or a means of transport if the mark is misleading as to the presence of danger or the nature of any danger.

Misleading as to the presence of danger = Displaying a safety mark when no dangerous goods are present.

Misleading as to the nature of danger = Displaying a safety mark that does not represent the class or product of dangerous goods.



For example, Class 3 placards on a road vehicle transporting METHYL CHLORIDE would be considered misleading as to the **nature** of danger, since this product is classified as a Class 2.1, Flammable Gas.

In addition, a person must not display any *other* mark that could be mistaken for a dangerous goods safety mark or is misleading as to the presence or nature of any danger.

Note: Displaying a safety mark for a small quantity of dangerous goods is not considered to be misleading. However, displaying a safety mark on a means of containment that is empty, cleaned or purged of dangerous goods is considered to be misleading.

Labels

When and how must a label be displayed?

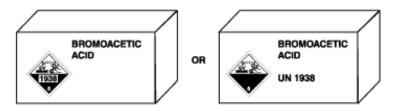
A label must always be displayed on a small means of containment in transport containing dangerous goods. One label is required for the primary class, as well as one for each subsidiary class of the dangerous goods.

Labels for the primary and subsidiary classes can be displayed on any side, except the top or bottom, of a small means of containment, and on the shoulder of cylinders. A package containing Class 7, Radioactive Materials must display a label on two opposite sides other than the side it is intended to rest or is to be stacked.

Exceptions to this basic labeling rule can be found in <u>Section 4.10</u> of the *TDG Regulations*.

Do other safety marks need to be displayed on a small means of containment?

Aside from labels, a small means of containment must also display the shipping name, technical name (if applicable) and UN number of the dangerous goods in transport. The UN number may appear on or next to the primary class label (see image below).





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When the Regulations allow for the reduction of a label to 30 mm, the label, shipping name, technical name and UN number may appear on a tag.

Note: There are additional requirements for Class 3, Flammable Liquids when transported by ship, as well as for Class 7, Radioactive Materials that must be met. These can be found in Sections 4.13 and 4.14.

Do I need to display a label on an overpack?

An overpack is defined as an enclosure used by one consignor to consolidate one or more small means of containment for ease of handling. An example of an overpack is a pallet on which one or more small means of containment are stacked and secured by straps or shrink wrap or other similar means.

When an overpack is used, the word 'Overpack' or 'Suremballage' must be displayed on one side.

If the labels and safety marks are not visible through the overpack, the primary class label and each subsidiary class label for each of the dangerous goods, as well as the shipping name and UN number, must be displayed on the overpack. Also, depending on the size of the overpack, this information is required on either one or two opposite sides.

Note: When the overpack contains Class 7, Radioactive Materials, the overpack must be prepared in accordance with the Packaging and Transport of Nuclear Substances Regulations.

Do I need to display a label on a consolidation bin?

A consolidation bin is used in a road vehicle to secure one or more small means of containment to prevent movement during transport. Unlike an overpack, a consolidation bin allows users to add or remove small means of containment during transport. A typical user of consolidation bins would be a delivery service that makes many deliveries in one route.

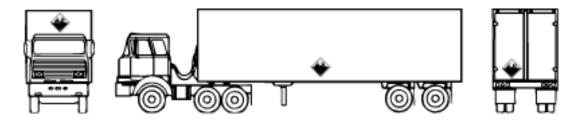
When a consolidation bin is used, the class of each dangerous good contained in the bin must be marked on a tag or on a fixed display device that is attached to the bin.



Placards

When and how must a placard be displayed?

The **primary class placard** for each dangerous good contained in a large means of containment must be displayed on each side and on each end of the large means of containment (as per section 4.15). Each placard only needs to be displayed once on each side and each end regardless of how many products in the large means of containment have that class (primary or subsidiary).



For example, if a vehicle is transporting UN1833, SULFUROUS ACID (Class 8) and UN1836, THIONYL CHLORIDE (Class 8), only one placard (Class 8) is required to be displayed on each side and on each end of the vehicle.

If required, the **subsidiary class placard** for each dangerous good contained in a large means of containment must be displayed on each side and on each end of the large means of containment. This is only required if the dangerous goods require an <u>emergency response assistance plan</u> (ERAP) **and** they have one of the following subsidiary classes:

- Class 1, Explosives,
- Class 4.3, Water-Reactive Substances,
- Class 6.1, Toxic Substances, Packing Group I due to toxic inhalation toxicity, or
- Class 8, Corrosives and are UN2977 or UN2978.

Note: A placard must NOT be displayed at a 45 degree angle on a truck frame or a supporting frame for the means of containment. This does not comply with the TDG Regulations.

Do other safety marks need to be displayed on a large means of containment?

Aside from placards, a large means of containment must also display the UN number of the dangerous goods if:

An ERAP is required; or



• It is a liquid or gas in direct contact with the large means of containment.

The UN number must appear on the placard or on a rectangular orange panel next to the placard (see image below).



When I can use the DANGER placard?

The DANGER placard is optional. It **may** be displayed on a large means of containment instead of any other placard required by <u>section 4.15</u>, if two conditions are met:

- 1. The large means of containment contains two or more dangerous goods that require different placards; and
- 2. The dangerous goods loaded into the large means of containment are contained in two or more small means of containment.

However, there are exceptions to this rule. The DANGER placard **cannot** be displayed on a large means of containment if:

- The dangerous goods have a gross mass greater than 1,000 kg, are included in the same class and are offered for transport by one consignor; or
- The dangerous goods require an emergency response assistance plan; or
- The dangerous goods are included in one of the following classes:
 - Class 1, Explosives,
 - Class 2.3, Toxic Gases,
 - Class 4.3, Water-reactive Substances,
 - o Class 5.2, Organic Peroxides, Type B,
 - Class 6.1, Toxic Substances (subject to Special Provision 23), and
 - Class 7, Radioactive Materials, Category III Yellow label.

Note: If a road vehicle or railway vehicle to be transported by ship contains a flammable gas, the flammable gas placard must be displayed on the road vehicle or railway vehicle.



What is the placarding exemption for dangerous goods with a gross mass of 500 kg or less?

<u>Section 4.16.1</u> provides an exemption from displaying placards on a road or railway vehicle if the dangerous goods have a gross mass that is less than or equal to 500 kg. You always have the option, however, to display placards for small quantities of dangerous goods voluntarily.

This exemption, however, does **not** apply if the dangerous goods:

- Require an emergency response assistance plan;
- Require the display of a subsidiary class placard;
- Are included in the following classes:
 - Class 1, Explosives (see exceptions in paragraph 4.16.1(2)(c)),
 - Class 2.1, Flammable Gases, if the road or railway vehicle is to be transported by ship,
 - Class 2.3, Toxic Gases,
 - Class 4.3, Water-reactive Substances,
 - Class 5.2, Organic Peroxides, Type B that require a control or emergency temperature,
 - o Class 6.1, Toxic Substances (subject to Special Provision 23), and
 - Class 7, Radioactive Materials, Category III Yellow label.

For example, if a road vehicle is transporting 400 kg of UN1216, ISOOCTENE, Class 3, placards do not need to be displayed since there is less than 500 kg in transport and none of the restrictions apply.

However, if a vehicle is transporting a mixed load of dangerous goods, each class of dangerous good must be considered separately. In the following example, a road vehicle is transporting 2,000 kg of UN1048, HYDROGEN BROMIDE, ANHYDROUS (Class 2.3(8)) and 300 kg of UN1107, AMYL CHLORIDE (Class 3). Since UN1048 meets one of the restrictions listed in section 4.16.1, a Class 2.3 placard must be displayed. As such, UN1048 must not be considered in the gross mass calculation. Now all that remains is 300 kg of UN1107, which does not meet any restrictions and is less than 500 kg. For this reason, a Class 3 placard does not need to be displayed.

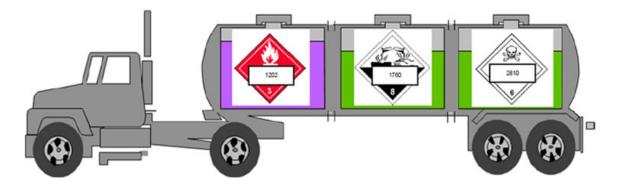
How do I display safety marks on a compartmentalized large means of containment?

There are different requirements for displaying safety marks on a compartmentalized large means of containment. It depends on if the dangerous goods are included in different primary classes or in the same primary class.



Different Primary Classes:

If the dangerous goods are included in **different primary classes**, the primary class placard and the UN number for the dangerous goods in each compartment must be displayed on each **side** of that compartment, as well as on each **end** of the compartmentalized large means of containment.

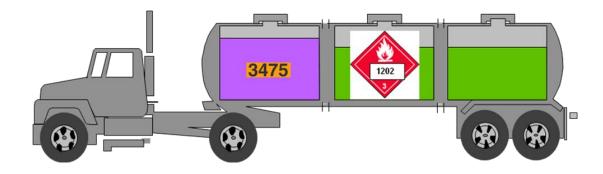


Same Primary Class:

If the dangerous goods are included in the **same primary class**, the primary class placard for the dangerous goods must be displayed only once on each side and on each end of the compartmentalized large means of containment. The UN number must also be displayed on each side of the compartment and on each end of the compartmentalized large means of containment.

However, when all of the dangerous goods are included in Class 3, Flammable Liquids, only the UN number of the dangerous goods with the lowest flash point is required to be displayed on each side and on each end of the compartmentalized large means of containment.

In addition, if the compartmentalized large means of containment contains UN3475, ETHANOL AND GASOLINE MIXTURE, the UN number must be displayed, along with the UN number of the dangerous goods with the lowest flash point, on each side and on each end of the compartmentalized large means of containment (see image below).





Can I voluntarily display placards for any quantity of dangerous goods?

Yes, despite the fact that a placarding exemption may be used, a person may voluntarily display a placard for any quantity of dangerous goods when they are transported in a road or railway vehicle if certain provisions of Part 4 are met. These provisions include:

- <u>Section 4.2</u> Misleading Dangerous Goods Safety Marks;
- Section 4.6 Visibility, Legibility and Colour;
- Section 4.7 Labels and Placards: Size and Orientation;
- <u>Subsection 4.9(2)</u> Removal or Change of Dangerous Goods Safety Marks;
- Section 4.14 Class 7, Radioactive Material;
- <u>Section 4.15.1</u> Subsidiary Class Placards on a Large Means of Containment;
- Paragraphs 4.15.3(a) and (b) Placards and UN Numbers on a Large Means of Containment; and
- <u>Section 4.16</u> DANGER Placard.

All of the above provisions must be met in order to voluntarily display a placard.

Other Safety Marks

Are there other safety marks that must be displayed besides labels and placards?

Yes, other safety marks and signs may be required when transporting certain dangerous goods. See below for a list of other marks and signs.

Elevated Temperature Sign:

The Elevated Temperature Sign must be displayed next to the primary or subsidiary class placard on each side and each end of the large means of containment when dangerous goods are transported at a temperature greater than or equal to:

- 100°C if the dangerous goods are in a liquid state; and
- 240°C if the dangerous goods are in a solid state.





Fumigation Sign:

When dangerous goods are used to fumigate a large means of containment, the fumigation sign must be displayed at or next to each entryway through which a person can enter the large means of containment.

The consignor must ensure that the fumigation sign is displayed by the person in charge of the fumigation process. The sign must also display the name of the fumigant, the date and time the fumigant was applied and the date of ventilation.

The fumigation sign must be displayed until the large means of containment has been ventilated and the dangerous goods have been unloaded.



Marine Pollutant Mark:

The Marine Pollutant Mark must be displayed for dangerous goods that are marine pollutants and transported by ship. This mark is not required for road and rail transport. For air, please refer to the International Civil Aviation Organization (ICAO) Technical Instructions.



Category B Mark:

The Category B Mark must be displayed on a small means of containment containing UN3373, BIOLOGICAL SUBSTANCE, CATEGORY B, instead of displaying the Class 6.2 label.



Toxic – Inhalation Hazard:

When dangerous goods subject to <u>Special Provision 23</u> are in transport in a small or large means of containment, the words "toxic by inhalation", "toxic – inhalation hazard", "toxique par inhalation" or "toxicité par inhalation" must be displayed on the means of containment.



The words "POISON – INHALATION HAZARD", required in the 49 CFR, may be displayed on a means of containment, in addition to or instead of the above.

Note: Special Provision 23 applies to dangerous goods that meet the criteria for inclusion in Class 6.1, Packing Group I, due to inhalation toxicity.

Anhydrous Ammonia:

When UN1005, ANHYDROUS AMMONIA is transported in a large means of containment, there are two placarding options. You may either:

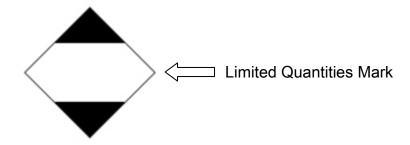
- 1. Display the Class 2.3 placard and a UN number; or
- 2. Display the Anhydrous Ammonia placard with the words "Anhydrous Ammonia, Inhalation Hazard" in letters of at least 6 mm wide and at least 50 mm high.



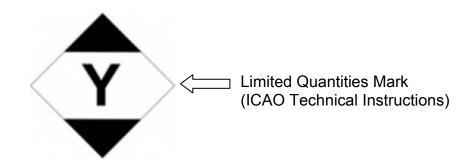
Note: In accordance with paragraph 4.6(a), dangerous goods safety marks must be displayed against a background of contrasting colour. However, since the placard, as well as the means of containment used for ANHYDROUS AMMONIA may both be white, the metal frame of the placard holder is deemed to be of contrasting colour (for this product only).

Limited Quantities Mark:

When complying with the Limited Quantities Exemption (section 1.17), the Limited Quantities Mark may be displayed on one side of a means of containment (as per subsection 1.17(2)).



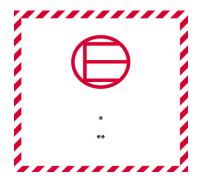




Note: Until December 31, 2020, instead of displaying one of the above marks, the means of containment may be marked with the words: "Limited Quantity", "Ltd. Qty.", "Consumer Commodity" or the UN number of each limited quantity of the dangerous goods in a square on point.

Excepted Quantities Mark:

When complying with the Excepted Quantities Exemption (section 1.17.1), the Excepted Quantities Mark must be displayed on one side of a means of containment.



International Shipments

In specific cases, the *TDG Regulations* allow the use of safety marks in accordance with other regulations. Refer to Parts 9, 10, 11 and 12 for more information.

For international **air** shipments, please refer to the International Civil Aviation Organization (ICAO) Technical Instructions.

For international **marine** shipments, please refer to the International Marine Dangerous Goods (IMDG) Code.

For **US/Canada** shipments (road and rail), please refer to the 49 CFR (Code of Federal Regulations).



Contact Information

Compliance with the Transportation of Dangerous Goods Act and Regulations

Failure to comply with the *TDG Act* and *TDG Regulations* can lead to fines and/or prison. You can visit the TDG website at: www.tc.gc.ca/tdg. If you have any questions about the *TDG Regulations*, contact a Transport Canada dangerous goods inspector in your region.

Atlantic Region	1-866-814-1477	TDG-TMDAtlantic@tc.gc.ca
Quebec Region	(514) 283-5722	TMD-TDG.Quebec@tc.gc.ca
Ontario Region	(416) 973-1868	TDG-TMDOntario@tc.gc.ca
Prairie & Northern Region	1-888-463-0521	TDG-TMDPNR@tc.gc.ca
Pacific Region	(604) 666-2955	TDGPacific-TMDPacifique@tc.gc.ca

This advisory notice provides a general outline of the safety mark requirements. However, the *TDG Act* and Regulations must be consulted to ensure all applicable requirements are met.

