Requirements for packaging, marking and labeling of dangerous goods

Abstract

General requirements for packages, packaging preparation and the marking and labels required for packages containing dangerous goods which is shipped either as fully regulated or as exempted dangerous goods.

Application

This applies as general requirements for packages which will contain dangerous goods and are based on the dangerous goods regulations for the transport of dangerous goods by sea and air as these regulations are the most restrictive.

For specific information regarding package, marking and labeling requirements for dangerous goods, always consult dgr.support@ericsson.com or Ericoll – Dangerous Goods Regulation Management

The requirements found in this and its related instructions are based on the general and some specific requirements found in the international dangerous goods regulations.
# General dangerous goods requirements

## Ericsson Internal

### INSTRUCTION

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1 General requirements

All types of dangerous goods, whether it can be consigned as exempted dangerous goods or fully regulated must be packed, marked and labeled as described in this instruction, the related packing instructions and where applicable supplemented with additional information as required by national regulations.

This instruction is based in the international regulations for the transport of dangerous goods. As the regulations for transport by Sea and Air are considered the most restrictive, this instruction is based on those restrictions.

This instruction does not override any international or national regulations. When any international or national regulations are less restrictive the requirements in this instruction applies. When any national or international regulations are more restrictive these shall be complied with. Specific packing instructions found in the regulations for substances and articles classified as dangerous goods have always precedence over these requirements however these requirements are based on those.

2 General packing requirements

2.1 Specific

Each package must:

a Comply with the set of packing requirements appropriate to the type of packing to be used;

b Be permitted by the applicable packing instruction;

c Not exceed the overall quantity restriction per package as defined in the applicable packing instruction, dangerous goods table or to the design limit for the package whichever is more restrictive.

d Not contain inner packagings exceeding the quantity limits as specified in the applicable packing instruction;

e Must be assemble and secure exactly in the manner intended; and

f External surfaces of assembled package(s) must be clean of contamination arising from the filling process itself or from contamination from the environment surrounding the filling/assembly area.
2.2 Packing Quality

Dangerous goods must be packed in good quality packagings which must be strong enough to withstand the shocks and loadings normally encountered in transport, including removal from pallet, unit load device or overpack for subsequent manual or mechanical handling.

Packagings must be constructed and closed as to prevent any loss of contents when prepared for transport which might be caused under normal conditions of transport, by vibration or by changes in temperature, humidity or pressure (resulting from altitude, for example).

Packages (including inner packagings and receptacles) must be closed in accordance with the information provided by the manufacture. No dangerous goods residue must adhere to the outside of packages during transport. These provisions apply, as appropriate, to new, reconditioned or remanufactured packagings.

Package made available for transport shall not have any damages, dents or scratches and in all respects in proper condition for transport.

Note:
The nature of transport dictates that many packages are likely to be moved between different modes of transport with attendant increases in handling e.g. from vehicles into warehouses and then onto aircraft etc. Additionally, packages consigned on a pallet may be removed from that pallet to assist handling and loading which may be carried out manually. To avoid damage and leakage from packages during transport, shippers should take this into account in selecting an appropriate packaging or in making the decision about the suitability of an already packaged item. In this respect it is recommended that small single packagings, with a capacity of 2 L/kg or less, should be overpacked to facilitate handling and to permit adequate securing of the dangerous goods aboard the aircraft.

2.3 Performance Test Requirements

Unless otherwise provided for, when United Nation (UN) specification packagings are required in a packing instruction, it must meet the performance test requirements of the relevant packing group.
2.3.1 Test report

A packing test certificate/report is required before a UN specification package is purchased or used for the first time, this include 3rd party vendor UN specification packagings. The report shall at least contain the following particulars:

- Name and address of test facility;
- Name and address of applicant (where applicable);
- A unique test report identification;
- Date of the test report;
- Manufacturer of the packaging;
- Description of the packaging design type (such as dimensions, materials, closures, thickness, etc.) including method of manufacture (such as blow-moulding), and which may include drawing(s) and/or photographs;
- Maximum capacity
- Characteristics of test contents, such as viscosity and relative density for liquids and particle size for solids;
- Test descriptions and results;
- Signature, with the name and status of the signatory.

Detailed requirements for UN specification packagings are found in UN Model Regulations latest revised version and in each transport regulations [REF a].

2.3.2 Enclosure instructions

Manufacturers and subsequent distributors of packagings must provide information regarding procedures to be followed (including enclosure instructions for inner packagings and receptacles), a description of the type and dimensions of closures (including required gaskets) and any other components needed to ensure that packages as presented for transport are capable of passing the applicable performance test and the pressure differential requirements.

2.3.3 Non-UN approved packages

When the dangerous goods regulations specific packing instruction is not requiring an UN approved packaging or dangerous goods which is shipped according to an exemption, such package must at least fulfill the following requirements.

1. Each package must be capable of withstanding a 1.2 m drop test on to a rigid, non-resilient, flat and horizontal surface, in the position most likely to cause damage. The criteria for passing the test are that the outer packaging must not exhibit any damage liable to affect safety during transport and there must be no leakage from the inner packagings(s).

2. Each package must be capable of withstanding, without breakage or leakage of any inner packaging and without significant reduction of effectiveness, a force applied to the top surface for duration of 24 hours equivalent to the total weight of identical packages if stacked to a height of 3 m (including the test sample).
2.4 Compatibility Requirements

2.4.1 Direct Contact of packagings

Parts of packagings which are in direct contact with dangerous goods must:
- not be affected or significantly weakened by those dangerous goods; and
- not cause a dangerous effect, e.g. catalyzing a reaction or reacting with the dangerous goods

Where necessary, they must provide with a suitable inner coating or treatment.

2.4.2 Materials of construction

Materials, such as some plastics, which can be significantly softened or rendered brittle or permeable by the temperatures likely to be experienced during transport or because of the chemical action of the contents or the use of a refrigerant, must not be used.

2.5 Test and Vibration Resistance

The body and the closure of any packaging (inner and outer packagings) must be so constructed as to be able adequately to resist the effects of temperature and vibration occurring in normal conditions of transport.

Stoppers, corks or other such friction-type closures must be held in place, securely, tightly and effectively by positive means (for example by the use of adhesive tape, friction sleeves, welding or soldering, positive locking wires).

The closure device must be so designed that it is unlikely that it can be incorrectly or incompletely closed, and must be such that it may be checked easily to determine that it is completely closed.

2.6 Ullage

When filling for liquids sufficient ullage (outage) must be left to ensure that neither leakage nor distortion of the receptacle will occur as a result of an expansion of the liquid caused by temperatures likely to prevail during transport. Liquids must not completely fill a packaging at a temperature of 55°C.

2.7 Package/Overpack Re-Use

Before a packing is authorized for re-use, or an overpack is re-used, all inappropriate dangerous goods markings and labeling are removed or completely obliterated.

A re-use package or re-use overpack must fulfill the same requirements as for a new package.
2.8 Packing Groups

For packaging purpose, Packing Groups numbers I, II & III are assigned to dangerous goods in Classes 3, 4, 5, 6, 8 and 9 according to the relative degree of danger presented by the article or substance.

**Note:** Some substances assigned Packing Group and articles are for packing performance purpose assigned more restrictive packing performance standard than the assigned packing group. This information is found in the specific packing instruction.

<table>
<thead>
<tr>
<th>Packing group</th>
<th>Relative degree of danger</th>
<th>Code included in the UN specification code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Packing Group I</td>
<td>Substance presenting high danger</td>
<td>Package meeting packing group I standard shall have the letter “X” in the Specification Code.</td>
</tr>
<tr>
<td>Packing Group II</td>
<td>Substance presenting medium danger</td>
<td>Package meeting packing group II standard shall have the letter “Y” in the Specification Code.</td>
</tr>
<tr>
<td>Packing Group III</td>
<td>Substance presenting low danger</td>
<td>Package meeting packing group III standard shall have the letter “Z” in the Specification Code.</td>
</tr>
</tbody>
</table>

2.9 Inner Packagings

2.9.1 Cushioning material

Inner packagings must be packed, affixed, secured or cushioned in an outer packaging in such way that, they cannot move, break, be punctured or leak their contents into the outer packaging.

Cushioning and absorbent material shall be inert and suited to the nature of the content.

Lithium Cells and Batteries must be placed in inner packagings that completely enclose the cell or battery.

Cells and Batteries must be packed so to prevent short circuit and movement within the inner packing and the outer packaging.

Inner packagings containing liquids must be packaged with their closures upward and placed within outer packagings consistent with the orientation markings.
Inner packagings that are liable to brake or be punctured easily, such as those made of glass, porcelain or stoneware or of certain plastic material, etc. must be enclosed in an inner liner and be secured in the outer packagings with suitable cushioning material. Any leakage of contents must not substantially impair the protective properties of the cushioning material or of the outer packaging.

2.9.2 Absorbent Material

Unless otherwise provided in this paragraph or in a packing instructions, liquids that are packed in glass, earthenware, plastic or metal inner packagings which are liable to brake must be packaged using absorbent material.

The quantity absorbent material must be such that it can absorb all liquid in case of leakage.

An absorbent material must not react dangerously with the liquid.

Absorbent material is not required if:

- the inner packagings are so protected that breakage of them is not possible;
- the leakage of their contents from the outer packaging will not occur during normal conditions of transport; and
- the leakage does not impair the package quality.

Where absorbent material is required and an outer package is not liquid tight, means of containing the liquid in the form of a leak-proof liner, plastic bag or other equally efficient means of containment.

2.9.3 Inner Liner

Unless otherwise provided for in the packing instructions, all liquids when packed in an outer package which is not leak-tight, must be provided with a means of containing the liquid in the event of leakage. This may be achieved with the use of a leak-proof liner, plastic bag or other equally efficient means of containment.

- Inner packaging
- Absorbent material
- Inner liner
- Cushioning material
- Outer packaging

2.9.4 Different Inner packagings

Where an outer packaging of a combination packaging has been successfully tested with different inner packagings, different inner packagings may also be assembled in this outer packaging.

In addition, provided an equivalent level of performance is maintained, the following variations in inner packagings are allowed without further testing of the package:
1. Inner packagings of equivalent or smaller size may be used provided the inner packagings are of similar design to the tested inner packagings, e.g. shape: round, rectangular, etc.;

2. The material of construction of the inner packagings (glass, plastic metal, etc.) offers resistance to impact and staking forces equal to or greater than that of the originally tested inner packaging; and

3. The inner packagings have the same or smaller openings and the closure is of similar design, e.g. screw cap, friction lid etc.;

A lesser number of the tested inner packagings, or of the alternative types of inner packagings identified in (1) above may be used provided sufficient cushioning is added to fill the void space(s) and to prevent significant movement of the inner packagings.

2.10 Supplementary packagings

Use of supplementary packagings within an outer packaging (e.g. an intermediate packaging or a receptacle inside a required inner packaging) additional to what is required by the regulatory specific packing instruction is permitted provided all relevant requirements are met, including those regarding Performance test requirements [2.3] and, if appropriate, suitable cushioning is used to prevent movement within the packaging.

2.11 Friction

The nature and thickness of the outer packaging must be such that friction during transport does not generate any heat likely to alter dangerously the chemical stability of the contents.

2.12 Venting of packagings

Venting of packagings to reduce internal pressure, which may develop by the evolution of gas from the contents is not permitted for air transport, except as otherwise specified in the air transport regulations.

2.13 Hermetically sealed packages

Unless otherwise specified in the dangerous goods regulations, packages containing substances according to 1 to 5 below shall be hermetically sealed.

1. Evolve flammable gases or vapour;

2. May become explosive if allowed to dry;

3. Evolve toxic gases or vapour;

4. Evolve corrosive gases or vapour; or

5. May react dangerously with the atmosphere
2.14 Orientation

Combination packagings containing liquid dangerous goods must be packed so that the closures on the inner packagings are upward and the upright position of the package must be indicated on it by the “Package orientation label”.

Orientation labels are not required when:

a. inner packagings each containing 120 ml or less with sufficient absorbent material between the inner and outer packagings to completely absorb the liquid content
b. gas in tight inner packagings such as tubes, bags or vials which are opened by breaking or puncturing. Each inner packaging must not contain more than 500 ml
c. infectious substances in primary receptacles not exceeding 50 ml

d. radioactive material

2.15 Package minimum size

A package must be of such size that there is adequate space to affix all necessary labels and markings, both those related to dangerous goods and other information such as package ID, shipping labels etc.

2.16 Empty Packagings

Empty packagings that have contained dangerous goods must be marked, labeled and placarded in the same manner as for a package filled with that substance unless adequate measures have been taken to nullify any hazard.

2.17 Packing used for Liquids

For plastic drums and Jerricans, unless otherwise approved by the appropriate national authority, the period of use permitted for the transport of dangerous goods must be not more than five (5) years from the date of manufacture of the receptacles, except where a shorter period of use is prescribed because of the nature of the substance to be transported.

Such plastic packagings must be marked with the year and date of when the package was manufactured.

2.18 Different Dangerous Goods packed in one Outer Packaging

An outer packaging may contain more than one type of dangerous goods or other goods provided that the goods are allowed according to:

a. Allowed to be packed in the same package according to the segregation table 7.2.1.16 in the IMDG-Code (Sea);

b. The dangerous goods do not react dangerously with each other and cause
   i. combustion and/or evolution of considerable heat;
   ii. evolution of flammable, toxic or asphyxiate gases;
iii. The dangerous goods do not require segregation according to the applicable segregation table for each transport mode;

c. Meet the specific requirement for “Mixed Packaging” in surface regulations and ‘All packed in one’ requirements in IATA-DGR.

2.19 Overpacks

The overpack [6] must not contain packages enclosing different substances which might react dangerously with each other or packages of dangerous goods which require segregation according to the applicable segregation table for each transport mode.

The intended function of each package must not be compromised by the overpack.

Each package contained within an overpack must be properly packed, marked, labeled and be free of any indication of damage or leakage and in all respects be properly prepared as required by the regulations.

In addition, all packages contained in an Overpack must be secured in such manner that they not move, break, be punctured or leak their contents.

Unless all marking and labels representative of all dangerous goods in the overpack are visible, the overpack shall:

a. Be marked with the word “OVERPACK”. The lettering of the “OVERPACK” shall be at least 12 mm high. The mark shall be in an official language of the country of origin and also; if that language is not English, French or German, in English, French or German;

b. Labels and marked with the UN number and other marks for each item of dangerous goods contained in the overpack. Each applicable mark or label only needs to be applied once.

3 General marking and labeling requirements

3.1 General

All packages shall be marked and labeled according to the latest Air transport requirements [REF g] unless a national requirement is more restrictive than the requirements set out in Air transport requirements [3.5].

All marking and labeling shall:

a. Comply with this section

b. Be applied or pre-printed on the same surface

c. UN number and proper shipping name shall appear adjacent to the hazard label

d. Labels and markings are not allowed to be:
   - Folded around corners
   - Affixed over each other
3.2 Definition of marking and labeling

- The term “mark” include all required information such as the UN number, proper shipping name etc.
  - Markings which identify the design or specification of a packaging, must meet the relevant requirements for Specification Packaging Marking. These markings are normally applied by the packaging manufacture, but are still ultimately the responsibility of the shipper.

- The term “labeling” concern all hazard labels that shall be used.

Specific requirements for the design and quality are defined in [Specification for dangerous goods labels and placards EAB-12:073659 Uen]

3.3 Markings

3.3.1 Packaging specification markings

Packaging specification markings are not required for packages containing

a. Limited Quantity;
b. Excepted Quantity;
c. Exempted dangerous goods;
d. Radiative materials; and
e. Those articles not required by a packing instruction.

3.3.2 Text and number size

Minimum size requirement which shall appear on a package and overpack is stipulated for the marking per below table:

<table>
<thead>
<tr>
<th>Mark</th>
<th>Package capacity &gt;30 kg/L</th>
<th>Package capacity ≤30 kg/L</th>
<th>Package capacity ≤ 5 kg/L</th>
</tr>
</thead>
<tbody>
<tr>
<td>UN Specification mark</td>
<td>12 mm</td>
<td>6 mm</td>
<td>Suitable size</td>
</tr>
<tr>
<td>UN number (including prefix)</td>
<td>12 mm</td>
<td>6 mm</td>
<td>Suitable size</td>
</tr>
<tr>
<td>The text “Overpack”</td>
<td>12 mm</td>
<td>12 mm</td>
<td>12 mm</td>
</tr>
<tr>
<td>The text “Salvage”</td>
<td>12 mm</td>
<td>12 mm</td>
<td>12 mm</td>
</tr>
</tbody>
</table>
3.4 Labeling

3.4.1 Type of labels

Labels are of two types:

- Hazard labels, which are required for most dangerous goods in all classes; and
- Handling labels which are required, either alone or in addition to the hazard labels, for some dangerous goods.

3.4.2 Hazard and handling label specification

All labels used on package of dangerous goods, must conform, in shape, color, format, symbol and text, to the specimen design in the applicable regulations.

Hazard labels must be in the form of a square with minimum dimensions of be at least 100 x 100 mm, set in an angel of 45° (diamond shaped).

The labels are divided into halves. The upper of the label is reserved for the pictorial symbol ad the lower half for the texts, the class or division number and the compatibility group letter as appropriate.

Detailed specifications are found in instruction: [Specification for dangerous goods labels and placards EAB-12:073659 Uen]

3.5 Affixing of labels and marks

Unless otherwise specified in the relevant regulations, special provision or packing instructions, each package and overpack containing dangerous goods shipped as fully regulated, must be marked with:

1. UN NUMBER(S) proceeded with the letters "UN"
2. The PROPER SHIPPING NAME(S) when applicable, supplemented with the technical name in brackets
    Note: The Technical name is only required for dangerous goods assigned special provision 274 in ADR, RID & IMDG and those who have the symbol in the dangerous goods list in IATA-DGR; and are normally found in the Material Safety Data Sheet section 3.
3. Hazard label and applicable subsidiary risk label(s) and handling labels
4. The full name of the Shipper and Consignee
5. The net quantity dangerous goods within the package
    a. Liter for liquids
    b. Kg for solids and articles
6 The Gross weight of the complete package

7 Hazard label as required by the packing instruction/dangerous goods regulations representing the dangerous goods contained in the package

8 Orientation labels on two opposite sides for packages containing liquids

9 Cargo Aircraft Only label on packages restricted to be transported on Cargo Aircraft Only

All labeling and marking concerning dangerous goods must be on the same surface, next to each other on the package.

3.6 Overpack

Unless all markings representative of all dangerous goods in the overpack are clearly visible the Overpack must be marked and labeled:

- according to [3.5] requirements and the total quantity per UN number
- Word “Overpack” with minimum text high 12 mm
- Address to shipper and consignee

Note

Packing specification mark must not be reproduced on the Overpack

4 General requirements for exempted dangerous goods

4.1 General

Dangerous goods that fulfill the requirements of an exemption in the regulations are only allowed to be transported if it is established that the substance or article fulfills all the requirements in for that special provision or sub-section.

The packaging used for exempted dangerous goods shall at least fulfill the General packing requirements except for the UN specification package requirement.

An exemption does not always apply on all transport modes therefore it is mandatory to confirm the exemption in all the transport regulations.

4.2 Limited quantity

The exemption differs between the regulations. The use of this exemption the applicable requirements are found in chapter 3.4 ADR, RID and IMDG.

Special requirements apply for Air transport, IATA-DGR sub-section 2.7

This exemption should only be used after consulting DGR Support as there are different requirements depending on the mode of transport.
4.3 Special provisions

4.3.1 Package

Packages containing exempted dangerous goods shall be packed in packages fulfilling the general packing requirements, but does not need to be an UN specification packaging.

4.3.2 Marking and labeling

Required dangerous goods information depends on the type of dangerous goods and special provision being used.

Consult DGR support for correct marking and labeling requirements.

5 Test certificates

Test certificates must be available for all types of UN specification packagings being used to verify the packagings performance upon request from competent authority [2.3.1].

Packagings which not need to be UN specification packaging but are intended to contain dangerous goods must have documentation verifying that design and construction takes the dangerous goods contents and requirements in consideration.

6 Definitions

The intended meaning of following terms shall be interpreted as follows

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Combination Package</td>
<td>A package containing one or more inner packagings.</td>
</tr>
<tr>
<td>Dangerous goods, fully regulated</td>
<td>Dangerous goods in quantities or as required by a transport mode to be consigned as regulated dangerous goods, and for which no exemption from the regulations can be applied</td>
</tr>
<tr>
<td>Exempted Dangerous goods</td>
<td>Dangerous goods as by a special provision, pack instruction or another applicable section in the regulations can be consigned as exempted from the regulations. Note that dangerous goods exempted on one transport mode might be required to be consigned as fully regulated on another transport mode.</td>
</tr>
<tr>
<td>Inner package</td>
<td>A container/receptacle containing a substance. An article can be considered an inner packaging when placed in a combination packaging.</td>
</tr>
<tr>
<td>Labeling</td>
<td>Only Hazard and Handling labels as defined in the dangerous goods transport regulations. Hazard label is a label identifying type of dangerous goods; Handling label is a label identifying a certain type of handling such as Orientation labels, Cargo Aircraft Only, Magnetized Material etc.</td>
</tr>
</tbody>
</table>
### Marking
Marking includes all types of information excluding hazard and handling labels such as UN Package Specification Code, UN number, Addresses etc.

### Overpack
A handling device or extra outer packaging intended to handle one or more packages. Examples of such are:
- Load-carrying device such as a pallet of packages which packages are secured by
  - strapping,
  - shrink- or
  - stretch wrapping or
  - secured by other appropriate means,
- or outer protective packaging such as
  - boxes,
  - cages,
  - breeding

### Packaging
Both packages other than and UN Specification Packaging and UN Specification Packagings which is considered the transport ready package which contain goods and cushioning material.

### UN Specification Packaging
A package that have been tested and approved according to the packaging test and performance criteria as per United Nations Recommendation on the transport of dangerous goods. Such packagings shall be durably marked with their UN specification code on the package, verifying that they have passed such tests as required for the packaging type.

### Reference regulations
7
a UN Recommendations on the Transport of Dangerous Goods - Model Regulations
   [Link]
b The European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR)
c Intergovernmental Organization for International Carriage by Rail (OTIF/RID)
d The European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN)
e International Maritime Dangerous Goods Code (IMDG)
f Technical Instructions For The Safe Transport of Dangerous Goods by Air (ICAO-TI)
g International Air Transport Association – Dangerous Goods Regulations (IATA-DGR)
8 Changes and revisions of this instruction

<table>
<thead>
<tr>
<th>Date</th>
<th>Notes</th>
<th>Signum</th>
</tr>
</thead>
<tbody>
<tr>
<td>2014-12-29</td>
<td>• Link to Ericoll updated</td>
<td>Emarosv</td>
</tr>
<tr>
<td></td>
<td>• Sub-section 2.9.2 new section</td>
<td></td>
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<tr>
<td></td>
<td>• Sub-section 2.9.2.1 removed</td>
<td></td>
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<tr>
<td></td>
<td>• New Sub-section 2.10 Supplementary packagings</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Sub-section 2.14 (old 2.13) edited - when orientation label is not required</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Cargo Aircraft restrictions in section 2.19.3 (old 2.18.3) is removed</td>
<td></td>
</tr>
<tr>
<td>2016-01-11</td>
<td>Update to reflect the 2017 regulatory requirements. <strong>New</strong> entries are marked with a solid border to the left. <strong>Edited</strong> items are marked with a dotted border to the left. Main update, added clarification on the requirements for text mark minimum size and Overpack requirements.</td>
<td>Emarosv</td>
</tr>
</tbody>
</table>