
**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
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Item 3(c) of the provisional agenda

EXPLOSIVES, SELF-REACTIVE SUBSTANCES AND ORGANIC PEROXIDES
Miscellaneous proposals

Comment on ST/SG/AC.10/C.3/2003/33 (Norway)

A new label for Division 5.2

Transmitted by the International Technical Committee for the prevention and
Extinction of Fire (CTIF)

CTIF welcomes the initiative taken by the Expert from Norway to improve the existing labelling system.

Emergency responders are trained to use the labelling system, which is one of their most important sources of information when approaching an incident and much attention is therefore paid to the precise hazard identification.

The fact that the only difference between 2 labels (pictograms ^{GHS-term}) is the division number in the lower corner creates, problems, not only in training but also in emergency response actions. This applies not only to Class 5 substances but also to Flammable Gases and Flammable Liquids.

CTIF believe that graphical information, e.g. symbols, colours, background patterns, are a far better means to convey information about the inherent dangers of a substance than numbers or text.

Numbers or text are useful for handling, storage and transport under normal conditions but in an emergency situation identification from a distance is best done with labels (pictograms ^{GHS-term}) which show a unique combination of symbol, colour and background pattern.

CTIF supports the idea that substances of Division 5.1 and Division 5.2 should be labelled in different ways, so as to be easily distinguished from a distance.

CTIF would like to suggest the following alternative option for a new label (pictograms ^{GHS-term}):



The general appearance is maintained but these colours give a better identification of the symbol from a distance in poor visibility conditions than if a red background is used.

Division Numbers could be added in the lower corner.

In an emergency situation the most critical property of Division 5.2 substances is their potential to react violently, rather than flammability. A colour which is widely used to convey violent reactions is orange – used in class 1 and therefore another option could be to use the combination of the symbol “Flame over circle” with the orange colour.

Conclusion:

CTIF believes that the existing labelling system is good but could be improved and therefore recommend that the Subcommittee supports the proposal from the Expert from Norway for different labelling of class 5.1 and 5.2 substances and further asks the Subcommittee to consider the alternative labelling option presented in this paper.

Should the Sub-Committee support this proposal, CTIF would be willing to give further consideration and advice on the best labelling system.
