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**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

Twenty-fifth session, 5-14 July 2004
Item 7 of the provisional agenda

**MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS
ON THE TRANSPORT OF DANGEROUS GOODS**

Marking of packages

Proposal for size requirements of package markings
[in line with the requirements for marking of packagings (design type markings)]

Transmitted by the expert from Sweden

Introduction

In the UN Recommendations there is a requirement in 5.2.1.2 (a) that package markings “shall be readily visible and legible”. However, no size of letters and numerals is given for the proper shipping name, salvage marking, overpack marking, and other special markings for class 7 or for the UN number on packages. The regulation in 5.2.1.1 states as follows:

Unless provided otherwise in these Regulations, the proper shipping name for the dangerous goods as determined in accordance with 3.1.2 and the corresponding UN Number preceded by the letters "UN", shall be displayed on each package. In the case of unpackaged articles the marking shall be displayed on the article, on its cradle or on its handling, storage or launching device. For goods of Division 1.4, Compatibility Group S, the division and compatibility group letter shall also be marked unless the label for 1.4S is displayed. A typical package marking is:

Corrosive liquid, acidic, organic, n.o.s. (Caprylyl chloride) UN 3265.

On the other hand for the markings indicating that a packaging corresponds to an approved design type there are detailed requirements concerning the size of letters, numerals and symbols.

In 6.1.3.1 it is stated:

*Each packaging intended for use according to these Regulations shall bear markings which are durable, legible and placed in a location and of such a size relative to the packaging as to be readily visible. For packages with a gross mass of more than 30 kg, the markings or a duplicate thereof shall appear on the top or on a side of the packaging. **Letters, numerals and symbols shall be at least 12 mm high, except for packagings of 30 litres or 30 kg capacity or less, when they shall be at least 6 mm in height and for packagings of 5 litres or 5 kg or less when they shall be of an appropriate size.***

The expert from Sweden believes it is reasonable to include such requirements also for the proper shipping name, salvage marking, overpack marking, other special markings for class 7 and UN number. In the case of an emergency it must be easy for the rescue services as well as the staff at a terminal to find the markings during transport and temporary storage. Of course, one could consider if the proposed size should be even larger, but to avoid endless discussions on “how large is large enough”, Sweden proposes to adopt the size for letters, numerals and symbols, that is already included in the UN Recommendations.

For information in 7.1.5.5 in the 2004 IATA-DGR it is stated:

Package and overpack use markings should be at least 12 mm high except for packages of 30 L or 30 kg capacity or less when they should have a minimum height of 6 mm.

Proposal

Add the following new paragraph to the existing text of 5.2.1.1 (new text marked in bold)

Unless provided otherwise in these Regulations, the proper shipping name for the dangerous goods as determined in accordance with 3.1.2 and the corresponding UN Number preceded by the letters "UN", shall be displayed on each package. In the case of unpackaged articles the marking shall be displayed on the article, on its cradle or on its handling, storage or launching device. For goods of Division 1.4, Compatibility Group S, the division and compatibility group letter shall also be marked unless the label for 1.4S is displayed. A typical package marking is:

Corrosive liquid, acidic, organic, n.o.s. (Caprylyl chloride) UN 3265.

For all package markings required in 5.1.2.1, 5.2.1.1, 5.2.1.3 and 5.2.1.5, the letters, numerals and symbols shall be at least 12 mm high, except for packagings of 30 litres or 30 kg capacity or less, when they shall be at least 6 mm in height and for packagings of 5 litres or 5 kg or less when they shall be of an appropriate size.

Safety implications

Enhanced safety

Feasibility

No problems are foreseen

Enforceability

No problems are foreseen
