

# UN/SCETDG/25/INF.14

## UN/SCEGHS/7/INF.3

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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  
Geneva, 5-14 July 2004  
Item 12(c) of the provisional agenda

Sub-Committee of Experts on the Globally  
Harmonized System of Classification  
and Labelling of Chemicals

Seventh session, 14-16 July 2004  
Item 2 (a) of the provisional agenda

### HARMONIZATION WITH THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

#### Physical hazards

Comments on ST/SG/AC.10/C.3/2004/21 (Norway), ST/SG/AC.10/C.3/2004/71 (Russian Federation)  
ST/SC/AC.10/C.3/2004/66 (United States of America) and ST/SG/AC.10/C.4/2004/3 (Norway)

A new label for Division 5.2 of the Model Regulations and 2.5 of the GHS

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 as their most important information when approaching an incident site and react accordingly. Therefore much attention has to be paid on the precise hazard communication.

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

CTIF believes that graphical information, e.g. symbol, colours, background pattern, are by far the best means to convey information about the inherent dangers of a substance than this could be done with numbers or text.

The latter 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 <sup>GHS-term</sup>) which show a unique combination of symbol, colour and background pattern.

CTIF supports the idea that substances of Division 5.1 and substances of Division 5.2 should be labelled in a sufficiently different way, so as to make sure this difference being relatively easily observed also at a distance.

**Conclusion:**

CTIF would welcome if the Sub-Committee would support the idea that the existing labelling system should be improved – especially because it has an outstanding importance for hazard communication.

CTIF supports the rationale behind the proposal from the Expert of Norway. However the CTIF Hazardous Materials Commission is currently holding discussions with interested parties on marking systems with a view to submitting a strategic paper on the subject in the future<sup>1</sup>. CTIF looks forward to continuously cooperating with the UN Sub-Committees of Experts (TDG & GHS) to improve the hazard communication of dangerous goods for the enhanced safety and welfare of emergency responders and safeguarding the community.

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<sup>1</sup> *Principles have already been presented at the 5th meeting of the ILO Working group for the Harmonization of Chemical Hazard Communication, May 2000.*