

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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IMPROVEMENT IN HAZARD COMMUNICATION

Tolerance for labels deviating from the models of Chapter 5.2: further considerations

Transmitted by the Expert from the United Kingdom

1. In paper ST/SG/AC.10/C.3/2005/50, the expert from the United Kingdom raised the problem of differences in representation of the instructions on the appearance of labels, and made a proposal to remedy that problem. However, there are two areas in which it would be appropriate to expand on this issue.
2. Firstly, paper ST/SG/AC.10/C.3/2005/54 from DGAC on stencilled marks raises a conceptually similar point: that a symbol may vary from the prescribed form but remain legible and unambiguous. There are other related areas of communication media where consignors have been concerned about the acceptability of their depictions compared with UN or modal prescriptions, for example commas or full stops in markings and documentation. The variations identified for labels in paper ST/SG/AC.10/C.3/2005/50 are, of course, potentially also an issue for placards.
3. Secondly, it is accepted that the phrase "minor variations" proposed for the new text in paragraph 5.2.2.2.1 of paper 2005/50 may, in isolation, be unclear.
4. The expert from the United Kingdom therefore proposes to insert text as a new paragraph into 5.1.1. This would allow for minor variations in visual representation across the range of hazard communications, and also contain a note explaining what types of variation would be acceptable:

"5.1.1.3 Hazard communication lettering and images shall conform, in terms of colour, symbols and general format, to the specimens shown in 3.1, 5.2.5.3, 6.1.3.1, 6.3.1.1, 6.5.2.1.1 or 6.6.3.1. Minor variations from these, which do not affect the obvious meaning, are permitted.

NOTE: Minor variations include the shading or design of symbols, shades of background colours, placement of lines or stripes, omission of punctuation."
