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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

Thirty-fifth session

Geneva, 22-26 June 2009

Item 5 of the provisional agenda

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

Marking on packages

Transmitted by the expert from Sweden¹

Background

1. In the UN Model Regulations there is a requirement in 5.2.1.2 (a) that package markings "shall be readily visible and legible". However, no size requirement is stated for the UN number or the proper shipping name on packages.
2. In 2004, Sweden put forward a proposal, suggesting a 12 mm size requirement for the marking of the UN number and the proper shipping name. However, the proposal, in document ST/SG/AC.10/C.3/2004/26, was not adopted. From the report (ST/SG/AC.10/C.3/50) it was indicated that:

¹ In accordance with the programme of work of the Sub-Committee for 2009-2010 approved by the Committee at its fourth session (refer to ST/SG/AC.10/C.3/68 para. 118(d) and ST/SG/AC.10/36, para. 14)

"Requiring a minimum size for package marking of the proper shipping name and UN number could have important cost repercussions on the industry, and there was no evidence that the present practices for these markings caused a problem to the emergency responders.

The discussion led also to the question as to whether or not the marking of the proper shipping name was of any use to the emergency responders, since they rather use the UN number only in emergency situations, and the technical information related to dangerous goods is provided in the transport document and usually on the work safety or consumer safety label required on the packaging under other regulations. "

3. The present situation is that markings on packages can be very small, as shown in the example on page 3 of this proposal. The drums in the picture are sent from a world-wide established chemical company. Both the UN number and proper shipping name are readily visible and legible in accordance with the provisions – but only at a very close distance.

4. Furthermore, for markings indicating that a packaging or an IBC corresponds to an approved design type, there are requirements stating that letters, numerals and symbols shall be at least 12 mm high.

5. In 7.1.5.5 in the IATA Dangerous Goods Regulations TI 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."

6. The expert from Sweden believes it is reasonable to include similar requirements for the marking of UN number marking. In case of an emergency the rescue services, must easily find the UN number in addition to the labels, since the UN number is vital for the emergency services to respond correct. They need to know quickly what kind of chemical they are facing, and should not have to seek for a UN number that is too small in size on a package. The marking is also important information for the staff at terminals, and for drivers, who need to know the UN number in order to proceed with the transport.

7. The expert from Sweden believes a size requirement will facilitate for enforcement bodies as well as for users. This will lead to same provisions in every country and will minimize the possibilities for different interpretation on what is "readily visible and legible".

Proposal

Amend 5.2.1 to read as follows (new text is underlined):

"5.2.1 Marking

5.2.1.1 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. The UN Number and the letters "UN" shall be at least 12 mm high. If the size of the package so requires, the dimension may be reduced, provided that the marking remains clearly

visible. 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:

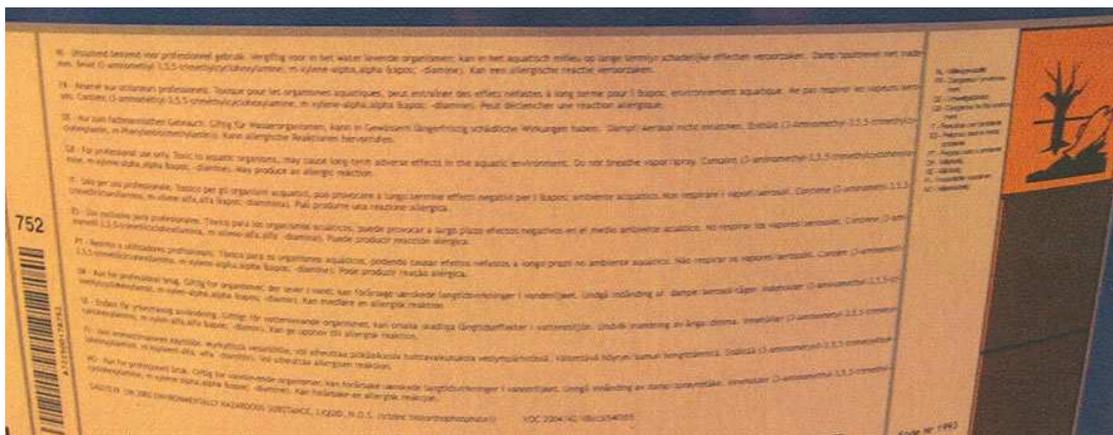
Corrosive liquid, acidic, organic, n.o.s. (Caprylyl chloride) UN 3265."

Example of marking on packages

The marking of UN number and the proper shipping name are placed on the consumer safety label at the side of these 140 litre drums.



The UN number and the proper shipping name are in the lower part of the enlarged label.



The size of the UN number and proper shipping name marking are approximately 1,5 mm high.

