

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 5 of the provisional agenda

Miscellaneous proposals of amendments to the Model Regulations on the Transport of Dangerous Goods

Comments on document ST/SG/AC.10/C.3/2010/43

Transmitted by the expert from Sweden

1. The expert from Sweden does not support the proposal from EIGA to allow a reduction of the marking size of the UN numbers and the letters “UN” to 3 mm for pressure receptacles up to 150 litres.

2. A year ago the Sub-Committee adopted minimum size requirements for the marking of the UN number and the letters “UN” on packages. The adopted text in 5.2.1.1 reads as follows:

“5.2.1.1 The UN number and the letters “UN” 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.”

3. Sweden believes a reduction will have safety implication and would once again like to emphasize that 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 correctly. They need to know urgently 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. Furthermore, accidents may occur at night and then the size of the different markings and labels is even more important. We believe a 3 mm size marking is hardly of any use to the emergency services in case of an accident or incident.

4. The expert from Sweden cannot find any justifications to allow marking exceptions for pressure receptacles. If pressure receptacles are involved in an accident and a fire or a leakage occurs, instant information about their content is essential. We do not agree with EIGA that it is difficult to accommodate characters of a size of 12 mm on panels corresponding to ISO 7225:2005, since the standard does not contain a size requirement for the panel.

5. This document contains a number of pictures in colour taken of different pressure receptacles marked with labels, UN number and other information texts required, which show that particularly the size of the UN number on these receptacles is very small and hardly readable even from a close distance. The situation is similar for the reduced labels. To conclude, we believe that the UN number and the letters “UN” on these pressure receptacles without any difficulty can and should be at least 12 mm.

Example of marking on pressure receptacles

The marking of UN number (size 2,5 mm) and the letters “UN” on pressure receptacles with a water capacity of 14 litres (pictures 1 and 2).



1.



2.

The marking of UN number (size 2,5 mm) and the letters “UN” on pressure receptacles with a water capacity of 50 litres (pictures 3 and 4).



3.



4.

The marking of UN number (size 2,5 mm) and the letters “UN” on pressure receptacles with a water capacity of 90 litres (pictures 5 and 6).



5.



6.