

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Geneva, 13–17 September 2010

Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: new proposals

Proposal to clarify 5.2.2.2.1.2 Provisions for labels of Cylinders for Class 2

Transmitted by the European Industrial Gases Association (EIGA)

Background

1. Under 5.2.2.2.1.2 of Chapter 5.2 of RID/ADR/ADN, reduced size labels (product warning signs) for cylinders are permitted. This is on account of their size and shape and for display on the non cylindrical part (shoulder) of such cylinders.
2. In 5.2.1.8 there is a requirement for packages containing environmentally hazardous substances to "be durably marked with the environmentally hazardous substance mark". This mark is shown in 5.2.1.8.3. This mark may be reduced in size on account of the package size.
3. The text in 5.2.2.2.1.2 states, "Cylinders for Class 2 may, on account of their shape, orientation and securing mechanisms for carriage, bear **labels** representative of those specified **in this section**, which have been reduced in size...".
4. With the requirement to label substances that are environmentally hazardous with the "environmentally hazardous substance mark" it is considered that 5.2.2.2.1.2 requires clarification because it refers only to labels, but 5.2 covers "Marking and Labelling".

Proposal

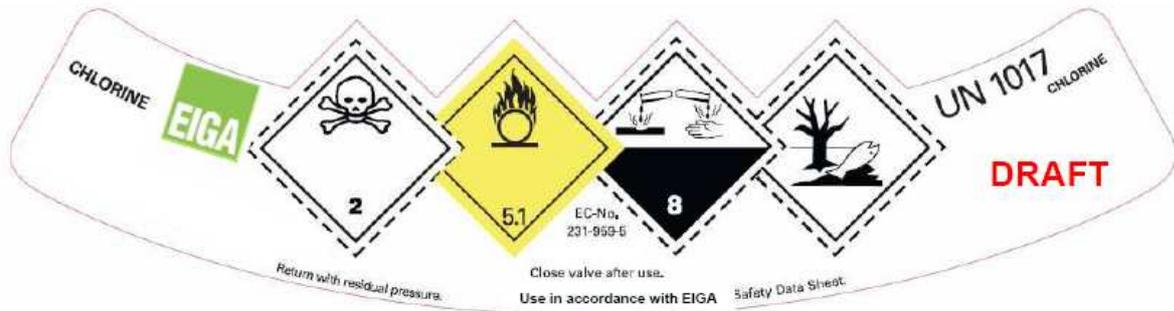
5. In order to clarify this, the proposal is to amend 5.2.2.2.1.2 with the addition of "and marks".

Consequently, 5.2.2.2.1.2 would read (additional text in bold):

"5.2.2.2.1.2 Cylinders for class 2 may, on account of their shape, orientation and securing mechanisms for carriage, bear labels **and the environmentally hazardous substance mark** representative of those specified in this section, which have been reduced in size according to ISO 7225:2005, for display on the non-cylindrical part (shoulder) of such cylinders. Labels **and the environmentally hazardous substance mark** may overlap to the extent provided for by ISO 7225 "Gas cylinders- Precautionary labels", however, in all cases, the labels representing the

primary hazard and the numbers appearing on any label shall remain fully visible and the symbols recognisable.”.

An example of a label for a chlorine cylinder is shown below detailing the labels and the environmentally hazardous substance mark:



Justification

6. This amendment will clarify the position when applying the environmentally hazardous substance mark to cylinders.

Safety implications

7. None foreseen