



**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****Forty-second session**

Geneva, 3 – 11 December 2012

Item 2 (d) of the provisional agenda

**Recommendations made by the Sub-Committee on its thirty-ninth,
fortieth and forty-first sessions and pending issues:****miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods****Marking/Labelling****Note by the secretariat¹****Introduction**

1. At its forty-first session, the Sub-Committee adopted amendments to the descriptions of labels, placards, symbols, markings and marks on the basis of document ST/SG/AC.10/C.3/2012/32.
2. When consolidating the text of amendments adopted during the thirty-ninth, fortieth and forty-first sessions (ST/SG/AC.10/C.3/2012/68) the secretariat noticed a number of inconsistencies or inaccuracies that the Sub-Committee may wish to correct.

I. Description of labels

3. Paragraph 5.2.2.2.1.1 was amended and includes a new figure 5.2.5 and a mandatory configuration. The location of elements of information is indicated by asterisks “*” and “**”.
4. For the information in the bottom corner, the single asterisk “*” means “class or division number shall be shown in this location in the bottom corner”. The secretariat

¹ In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

considers that this is not correct because the indication of the division number is not always required in this location.

5. For the information in the top left of the label, the text reads as follows:

“** the class or division symbol /numeral/text shall be shown in this location”.

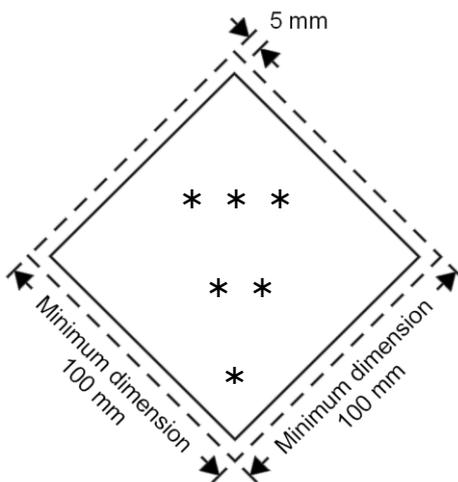
The secretariat considers that this is not correct because in most cases only the symbol has to be indicated in this location, except for division 1.4, 1.5 and 1.6. Text relating to the class or division is usually optional (except for division 6.2 and class 7) and, in any case, may be shown in the bottom half only.

6. Since the text in 5.2.2.2.1.1 is drafted as a mandatory text, the secretariat suggests the following wording for the amendment:

“5.2.2.2.1.1 Amend to read as follows:

“5.2.2.2.1.1 Labels shall be configured as shown in Figure 5.2.5.

Figure 5.2.5



Class/division label

* The class or, for divisions 5.1 and 5.2, the Division number shall be shown in the bottom corner

** Additional text/numbers/letters shall (if mandatory) or may (if optional) be shown in this bottom half

*** The class or division symbol or, for divisions 1.4, 1.5 and 1.6, the division number shall be shown in this top half”

A. Marks/markings

7. The secretariat notes that there are discrepancies in the English text in the use of the words “mark” and “markings” e.g. in 3.4.7, 3.4.8, 3.5.4.1, 3.5.4.2, 3.5.4.3, 5.2.1.6.3, 5.3.2.2, 5.3.2.3.2, 5.5.2.3.2, 5.5.3.6.2.

The secretariat suggests that English speaking delegations should review the terminology used in these paragraphs since this causes problems of translation into other languages.

B. Class 7 placard

8. The secretariat has been made aware of a dispute between two countries regarding the dimensions of the placard for Class 7, and more precisely the line running inside the edge. The general rule, according to 5.3.1.2.1 is that the line should run 12.5 mm inside the edge and parallel with it. There is an exception for Class 7, since according to 5.3.1.2.2 the line should run 5 mm, instead of 12.5 mm inside the edge. Although the current text of the Model Regulations and related international legal instruments make it clear that there is an exception for Class 7, this dispute shows that such exceptions are not in the interest of international transport facilitation, and the secretariat wanders whether there is any safety justification for such an exception. In other words, it would seem logical that, as for other classes of dangerous goods, the line on the Class 7 placard should run 12.5 mm inside the edge and not 5 mm as currently prescribed. The secretariat will bring this issue to the attention of IAEA before the next session.
