



**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-fifth session**

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Item 7 (f) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: marking and labelling****Marking on packages****Transmitted by the European Industrial Gases Association (EIGA) and
the European Liquefied Petroleum Gas Association (AEGPL)¹****Introduction**

1. Within 5.2.2.2, (Provisions for labels), 5.2.2.2.1.2 allows for cylinders of Class 2 to display labels which have been reduced in size according to ISO 7225:2005 on the non-cylindrical part (shoulder) of such cylinders. This ensures that labels are visible during transport. This provision accommodates the majority of cylinders in service.
2. However, with the introduction of new cylinder designs, other locations for the display of the labels have been introduced (see attached pictures). Although these alternative locations have advantages and meet the objectives of the specific precautionary labelling (the label remains visible and irremovable during transport and undamaged when the cylinder is transported or stored), they do not meet fully the wording of 5.2.2.2.1.2.
3. Furthermore, there are a number of small cylinders in service where it is not possible to affix even a reduced size label to the cylinder shoulder. The only possible place to affix the label is on the cylindrical part, (parallel portion) of the cylinder. Due to their size, such cylinders are not transported with other larger cylinders as it is not possible to secure them to vehicles. The method of transport is usually within an overpack which is labelled accordingly.

¹ In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

4. The proposal is to permit the display of the label on a fitting attached to the upper part of the cylinder or valve (casing, handling device) and for small cylinders only, on the cylindrical part of the cylinder.

Proposal

5. In order to take into account new cylinder designs and small cylinders, and to provide clarification to the regulations it is proposed to amend 5.2.2.2.1.2. To assist in evaluating the proposal, 5.2.2.2.1.2 is reproduced in full, and the additional text is italicised and underlined.

“5.2.2.2.1.2 Cylinders for Class 2 may, on account of their shape, orientation and securing mechanisms for transport, bear labels representative of those specified in this section, which have been reduced in size, according to ISO 7225, for display on the non-cylindrical part (shoulder) of such cylinders *or on a fitting attached to the upper part of the cylinder or valve*. Labels may overlap to the extent provided for in ISO 7225:2005 “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.

When the diameter of the cylinder is too small to permit the display of the reduced size labels on the non-cylindrical upper part of the cylinder, the reduced sized labels may be displayed on the cylindrical part.”

Justification

6. The justification is that it clarifies where labels for new cylinder designs and small cylinders may be affixed such that the appropriate information is readily available.

Safety implications

7. No safety implications are foreseen as this will ensure that labels are securely attached to cylinders and visible. Moreover, this new wording would permit the labels to be displayed beside the UN number and letters “UN” corresponding to the dangerous goods onto the handling device (see 5.2.1.1.).

