

Sub-Committee of Experts on the
Transport of Dangerous Goods
(Nineteenth session,
2-6 July 2001, agenda item 11 (d))

GLOBAL HARMONIZATION OF SYSTEMS OF CLASSIFICATION AND LABELLING OF CHEMICALS

Hazard communication

Use of a Diamond Shape Border for Symbols in the Globally Harmonized System (GHS)

Transmitted by the International Labour Office (ILO)

Background

1. The International Labour Organization (ILO) Work Group on Harmonization of Chemical Hazard Communication (WG/HCHC) met for the last time 21-24 May 2001.
2. The work on hazard communication was completed except for two issues. The purpose of this paper is to get input from the United Nations Sub-Committee of Experts on the Transport of Dangerous Goods (UN SCETDG) on an issue related to their sector. The IOMC CG/HCCS is responsible for completing the GHS, and will be using this input to make a final decision on the hazard communication portion of the GHS.
3. The UNSCETDG is requested to provide its input to the CG/HCCS immediately after the conclusion of its meeting in December 2001.

Recommendation of the ILO WG/HCHC concerning hazard symbols

4. In its work to develop a harmonized approach, the Drafting Group of the ILO Working Group for the Harmonization of Chemical Hazard Communication recommended the following:
 - a) For chemicals which are subject to the labelling requirements of the TDG Model Regulations:
 - b) For single packagings (e.g. drums, composite packagings, IBCs, etc.), the TDG pictogramme should be used.

NOTE: For outer packagings of combination packagings, only the TDG Model Regulations marking and labelling requirements would apply.

- c) For inner packagings of combination packagings, the pictogramme may be either the pictogramme required under TDG Model Regulations (in reduced format if appropriate) or a pictogramme consisting of a black symbol on white background framed by a broad red diamond (in this latter case, the symbol would be the same as that of the TDG pictogramme, e.g. a flame).

- d) For chemicals which are not subject to the labelling requirements of the TDG Model Regulations but which may be subject to the requirements of other downstream regulations, the pictogram to be used would consist of a black symbol on white background framed by a broad red diamond. This pictogramme would not be required on outer packagings of combination packagings.
1. The hazards concerned under 4(b) above are mostly related to chronic health effects, which may be represented by an exclamation mark symbol or a new symbol presently under development. The environmental hazard symbol might also appear in some cases not regulated under TDG Regulations.

The issue

2. Some representatives of the air transport sector have expressed concern at the fact that the use of hazard pictogrammes in the form of a black symbol on white background framed within a red border diamond in the case of chemicals not regulated for transport might entail confusion in package handling operations if red-bordered diamond-framed pictogrammes appear on a packaging not subject to TDG regulations. This perceived risk of confusion would be mainly due to the fact that air transport workers are trained to identify packagings bearing a diamond-framed hazard pictogramme as containing goods dangerous for transport, and to interrupt the transport operation if these packagings and accompanying documents are not in full compliance with transport regulations. These representatives are therefore suggesting that a different shape be used for the non transport part of the GHS symbols. This issue was raised at a May 2001 meeting of the International Civil Aviation Organization (ICAO) in Singapore, and a paper expressing this concern was tabled as a room document at the ILO Working Group meeting in May 2001 in Geneva.
3. After discussion at its May meeting, the majority of the ILO Working Group was in favour of keeping the requirement for a red diamond border in the final GHS document. This recommendation was confirmed by the IOMC Coordinating Group for the Harmonization of Chemical Classification at its meeting in Geneva on 24-25 May 2001. However, as suggested by the ILO Working Group the Coordinating Group agreed to refer the issue to the UN SCETDG to obtain their expert input on the potential impact of this issue on transport, particularly air transport, before the GHS is finalized.
4. In addition to the use of an alternate shape, there have also been other suggestions for dealing with the issue. In particular, it was proposed by some transport representatives that a significant differentiation in size between the TDG and the red-bordered diamond pictograms might be a way forward.

Request for input

5. The IOMC CG/HCCS invites the Sub-Committee of Experts on the Transport of Dangerous Goods to discuss this matter and to advise whether or not the use of such a black/white/red diamond in the cases referred to above would be likely to cause safety problems or any other significant problems in transport operations. A final recommendation by the end of the December Sub-Committee's session would be appreciated so as to allow a final determination on the issue and completion of the technical work on the GHS.
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