

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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MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Labelling and Placarding

Transmitted by the expert from the United Kingdom

Background

1. The United Nations Model Regulations specify that the label shall be affixed on a contrasting background (see 5.2.1.2(c)). However, this isn't in practice always readily achievable. For instance an infectious substances label may be placed on a white faced corrugated package.
2. The requirement for a contrasting background is not specified in the case of placards (see 5.3.1.1.2), consequently this may reduce the visibility of the placard; e.g. a Class 3 placard applied to a red painted portable tank will not stand out.
3. The first problem has obviously been recognised as both the air mode (see ICAO Technical Instructions Part 5 5.3.2.3(a) or IATA Dangerous Goods Regulations 7.2.6.1.(b)) and the US (CFR 49 §172.406(a)(3)(d)) provide that as an alternate to a contrasting background the label or placard must be delineated by a solid or dotted outer boundary.
4. The expert from the United Kingdom wonders whether other experts have found this issue to be a problem in their national legislation and whether they feel it is something to be addressed in the Model Regulations to achieve harmonisation across the modes. In view of the large number of papers for the current session, a formal proposal would be inappropriate now, but if there is a desire to address the issue, a proposal along the lines of that set out below could be submitted for the July 2004 session.

Draft Proposal

1. Amend 5.2.1.2(c) to read as follows:-

"Shall be displayed on a background of contrasting colour, or must have a dotted or solid outer boundary, on the external surface of the package; and"
2. Amend 5.2.2.1.1 by adding the following sentence at the end. "Where the label is not applied to a contrasting background, see 5.2.1.2(c) then the label shall either have a dotted or a solid outer boundary line.

3. Amend 5.2.2.2.1 by adding at end of the existing text “Note: where appropriate labels in 5.2.2.2.2 are shown with a dotted outer boundary, as provided for in 5.2.2.2.1.1. This is not required when the label is applied on a contrasting background.
4. Amend 5.3.1.1.2 to sentence “Placards shall be displayed on a background of contrasting colour, or shall have either a dotted or solid outer boundary line.”
