

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

Marking of Packages

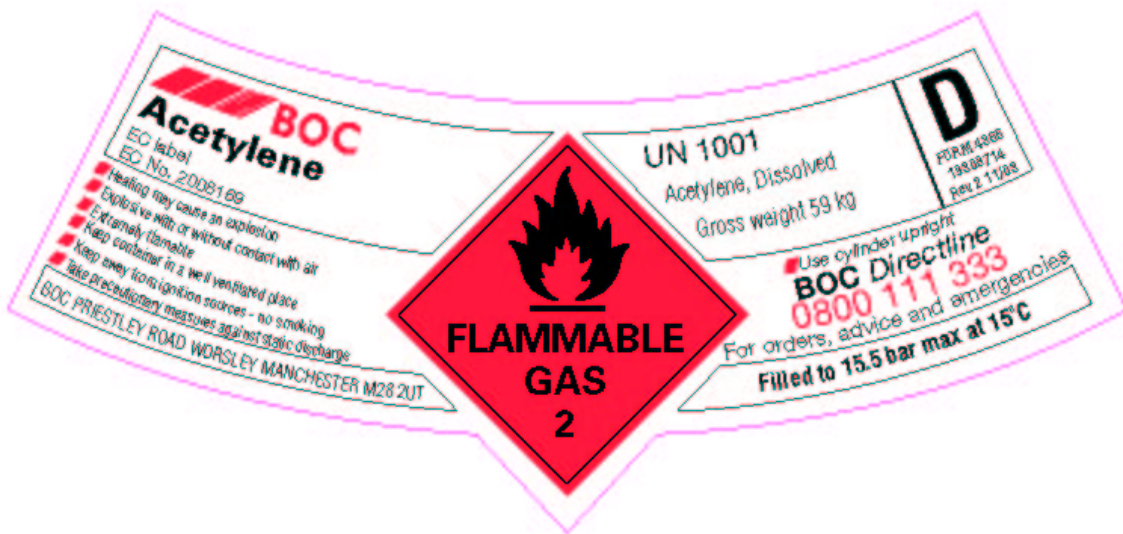
Comments on paper ST/SG/AC.10/C.3/2004/26

Transmitted by the European Industrial Gases Association (EIGA)

Introduction

The available area for marking cylinders used for transporting gases is very small. The way cylinders are transported (generally strapped close together in pallets) means that labels on the cylindrical portion of the body would not be visible in transport and would soon become defaced and illegible. The industry has therefore used labels of a reduced size mounted on the non-cylindrical part (shoulder) of the cylinder. This practice is recognized in the Model Regulations in provision 5.2.2.2.1.2. As well as using a reduced size label, the area covered by a paper sticker has to be kept small so that the essential stamp markings are not obscured.

The amount of information required in this restricted space is large and small print fonts are a necessity. The following example of a paper sticker shows the amount of information necessary, not only for transport purposes but also to give the user information required under general product safety legislation. For reference, on this label the UN number is shown at 2.5 mm high and the company logo is 4 mm high; the label has a 30 mm square size which is larger than the 25 mm reduced size label permitted by 5.2.2.2.1.2. This particular example is taken from a cylinder having a water capacity of 30 liters and is therefore at the size where under the Swedish proposal a transition would be made from 6 mm high letters to 12 mm high. The latter size certainly cannot be accommodated and 6 mm text would be difficult to fit into the space available. EIGA therefore proposes that gas cylinders be exempted from this requirement.



Proposal

To the proposal in paper ST/SG/AC.10/C.3/2004/26 add the following sentence:

“These package markings shall be of an appropriate size when shown on the non-cylindrical part (shoulder) of cylinders for Class 2 in conjunction a label reduced in size in accordance with 5.2.2.2.1.2.”