

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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Item 6 of the provisional agenda

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

Position of UN Number and Hazard Description on Labels and Placards

Transmitted by the expert from the United States of America

Background

1. The expert from the United States has reviewed the proposal from the United Kingdom regarding tolerance for labels deviating from the models of Chapter 5.2 (ST/SG/AC.10/C.3/2005/50) and supports the objective of the proposal.
2. In addition to the issues raised in 2005/50, it is proposed that the Model Regulations be amended to clarify the location in which optional hazard communication elements such as the UN Number and text describing the hazard may be placed. Currently the Model Regulations allow additional descriptive text on labels in 5.2.2.2.1.5 which states "the insertion of any text (other than the class or division number) in the space below the symbol shall be confined to particulars indicating the nature of the risk and precautions to be taken in handling". However, this paragraph is not entirely consistent with 5.2.2.2.1.3 which requires any additional text to be "on the lower half" of the label. It is proposed that 5.3.2.1.2 and 5.2.2.2.1.3 be amended to clarify that additional text describing the hazard posed by the material such as "flammable" may appear in the *centre area* of the label rather than strictly in the "lower half". It is noted that it is the current practice in some countries to include optional text in the centre area of labels and placards (see examples below).

Example 1



Example 2



Example 3:



Proposal:

2. Amend 5.3.2.1.2(a) by adding the underlined text as follows:

(a) Against a white background in the area below the pictorial symbol and above the class or division number and the compatibility group letter in a manner that does not obscure or detract from the other required label elements in the lower half of each placard (see Figures 5.3.1 and 5.3.2); or

3. Amend 5.2.2.2.1.3 as follows:

5.2.2.2.1.3 ~~Labels are divided into halves.~~ With the exception of Divisions 1.4, 1.5 and 1.6, the upper half of the label is reserved for shall contain the pictorial symbol and the lower half for shall contain texts and the class or division number and the compatibility group letter as appropriate. The label may include text such as the UN number or words describing the hazard class or division (e.g. “flammable”) in accordance with 5.2.2.2.1.5 provided the text does not obscure or detract from the other required label elements.
