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**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

Twenty-ninth session  
Geneva, 3-12 (a.m.) July 2006  
Item 10 of the provisional agenda

**IMPROVEMENT IN HAZARD COMMUNICATION**

Tolerance for labels deviating from the models of Chapter 5.2

Transmitted by the expert from the United Kingdom

**Background**

1. At the 28<sup>th</sup> session of the Sub-Committee, the expert from the United Kingdom introduced document ST/SG/AC.10/C.3/2005/50 and informal document UN/SCETDG/28/INF.20. Together, these identified a range of areas of hazard communication where differences in opinion as to the acceptability of small variations are currently causing problems. As a combined proposal, they also suggested new wording in the Model Regulations to explicitly make such variations acceptable.
2. Many Sub-Committee members felt that putting new text into the Model Regulations, located as was proposed in Chapter 5.1, would unduly localise a concept that ran across the visual communication media, these actually consisting of matters as diverse as punctuation of Proper Shipping Names and packaging markings. They felt even more strongly that the real-life example of strict interpretation given could be more appropriately dealt with by better training of enforcement officers, among others.

## Proposals

3. The expert from the United Kingdom proposes to deal with both of these concerns:

- (a) The question of where text should be located clarifying the general principle of acceptability of small variations. This could be achieved by amending the general provisions in Chapter 1.1, specifically by adding a note to existing paragraph 1.1.1.1:

"1.1.1.1 These Regulations prescribe detailed requirements applicable to the transport of dangerous goods. Except as otherwise provided in these Regulations, no person may offer or accept dangerous goods for transport unless those goods are properly classified, packaged, marked, labelled, placarded, described and certified on a transport document, and otherwise in a condition for transport as required by these Regulations.

*Note: Formats for lettering and images on packagings, documents and other communication media are indicated in the relevant Chapters in these Regulations. However, minor variations from these, which do not affect the obvious meaning, are acceptable and should not be treated as infractions of the relevant modal regulations. "Minor variations" include the shading or design of symbols, shades of background colours, placement of lines or stripes, omission of punctuation."*

- (b) The question of training for enforcement officers. The expert from the United Kingdom believes that many of the aspects covered in Chapter 1.3 are already applied by competent authorities to enforcement officers. The issue of variations in labels etc. could be addressed by adding a sentence to the end of 1.3.2(a)(ii):

"....and a description of available emergency response documents. *Persons undergoing training in familiarisation with hazard information such as labelling and placarding shall be made aware of minor variations that are permitted; see the Note in section 1.1.1.1.* "

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