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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

Thirty-sixth session  
Geneva, 30 November – 9 December 2009  
Item 5 of the provisional agenda

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

Application of hazard label for environmentally hazardous substances

Transmitted by the International Air Transport Association (IATA)<sup>1</sup>

**Background**

1. The 15<sup>th</sup> revised edition of the Model Regulations introduced a new requirement into Chapter 5.2 whereby packages containing environmentally hazardous substances, subject to quantity conditions being met, must have the “dead fish and tree” environmentally hazardous substances (EHS) mark (Figure 5.2.2) applied to the outside of the package.
2. Notwithstanding that the EHS symbol is designated as a “mark”, the design, shape and size is seen and generally produced as a label. Because the EHS symbol is seen and produced as a label there is some confusion on the part of consignors and carriers where it is believed that the EHS mark takes the place of the Class 9 hazard label for packages containing UN 3077 or UN 3082.

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2009-2010 approved by the Committee at its fourth session (refer to ST/SG/AC.10/C.3/68, para. 118 (d) and ST/SG/AC.10/36, para. 14).

3. A review of the text of 5.2.1.6, which specifies the special marking requirements for environmentally hazardous substances, identifies that the placement of the EHS mark in relation to the marking of the UN number and proper shipping name is clearly stated. However, there is no reference in 5.2.1.6 that the EHS mark, when required, must be applied to the package in addition to the Class 9 hazard label.

### **Proposal**

4. The Sub-Committee is invited to add the following paragraph to subsection 5.2.6.1:

“5.2.6.1.4 Regardless of the application of 5.2.1.6.1, all packages containing environmentally hazardous substances (UN Nos. 3077 and 3082) shall bear a Class 9 hazard label.”.

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