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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-ninth session**

Geneva, 20–24 June 2011

Item 5 (c) of the provisional agenda

**Miscellaneous proposals of amendments to the Model Regulations  
on the Transport of Dangerous Goods: marking and labelling****Marking on gas cylinders****Transmitted by the European Industrial Gases Association (EIGA)<sup>1</sup>****Introduction**

1. At the thirty-fifth session of the Sub-Committee of Experts on the Transport of Dangerous Goods, the expert from Sweden proposed to impose a minimum size for the marking of the UN number on packages. This was agreed with an amendment to paragraph 5.2.1.1. The wording is included in the annex to the report of the Committee on its fifth session (ST/SG/AC.10/38/Add.1) is reproduced below:

**"Chapter 5.2**

5.2.1.1 Insert the following new second sentence: "The UN number and the letters "UN" shall be at least 12 mm high, except for packagings of 30 litres or 30 kg capacity or less, when they shall be at least 6 mm in height and for packagings of 5 litres or 5 kg or less when they shall be of an appropriate size."

2. It was also noted in the report of the meeting that the minimum size requirement may have to be reviewed with respect to pressure receptacles.

3. As a result of this EIGA wishes to propose an addition to cover the specific requirements of pressure receptacles.

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<sup>1</sup> Conformément au programme de travail du Sous-Comité pour la période 2011-2012, adopté par le Comité à sa cinquième session (voir ST/SG/AC.10/C.3/76, par. 116 et ST/SG/AC.10/38, par. 16).

## Proposal

4. EIGA proposes to modify 5.2.1.1 to read as below:

### "Chapter 5.2

5.2.1.1 The UN number and the letters "UN" shall be at least 12 mm high, except for packagings of 30 litres or 30 kg capacity or less and except for gas cylinders of 60 litres water capacity or less, when the UN number and the letters "UN" shall be at least 6 mm in height. For packagings of 5 litres or 5 kg or less the UN number and the letters "UN" shall be of an appropriate size.

*NOTE: Pressure receptacles shall be brought into conformity with this provision no later than the date of the next periodic inspection after 1 January 2015."*

## Justification

5. Labels are affixed to the shoulder area of a cylinder to ensure that the label remains visible and undamaged when the cylinder is transported or stored. The shoulder of the cylinder is also the position at which the markings must be applied, see 6.2.2.7.5. These marks cannot be applied to the cylindrical part of cylinders as they would cause "harmful stress concentrations", see 6.2.2.7.6.
6. The shoulder of a cylinder is spherical, which means that a label has to be of a size and shape such that when applied there are no gaps between the surface of the cylinder shoulder and the label, otherwise the label will not adhere to the cylinder. Therefore large labels are not practical for a cylinder shoulder.
7. Any label must be small enough to ensure that the markings on the shoulder remain visible.
8. In addition to the requirements for labelling for transport there are also mandatory requirements to provide information on the use of the product, and for the majority of gases this information is included on the label fitted to the shoulder of the cylinder.
9. The EIGA proposal applies to gas cylinders of up to 50 litres water capacity so the majority of cylinders in circulation would have the UN letters and number at 6 mm height.
10. Examples of labels with the UN number and letters of 6 mm are shown in the annex.

## Safety implications

11. No safety implications are foreseen.

Annex

