

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 5 (c) of the provisional agenda

Miscellaneous proposals of amendments to the

Model Regulations on the Transport of Dangerous goods: marking and labelling

The size of "OVERPACK" and "SALVAGE" markings

Transmitted by the expert from the United Kingdom

Introduction

1. At the 35th session of the Sub-Committee of Experts on the Transport of Dangerous Goods, text specifying the height of the UN number and letters "UN" in paragraph 5.2.1.1 was adopted, (ST/SG/AC.10/C.3/2009/1 and informal document INF.44, both from the expert from Sweden). This text is similar to the text which already existed in paragraph 6.1.3.1 for package specification markings.
2. These provisions ensure that lettering is of an appropriate size for packagings, namely 12 mm high. There are exceptions for packagings between 30 litres/30 kg and 5 litres/5 kg where the letter is 6 mm in height and for packagings below 5 litres/5 kg where the lettering shall be "an appropriate size".
3. It has been brought to the attention of the expert from the United Kingdom that the same problem is arising of inappropriately small lettering being used for the "OVERPACK" marking. Additionally, the expert from the United Kingdom notes that the "SALVAGE" marking in paragraph 5.2.1.3 has no letter size specification.
4. Overpacks are packagings which bind together a number of other packagings. As such, they can be expected to be of a fairly large size. Salvage packagings overlay damaged packagings, often with layers of absorbent material. They also do not need to bear decoration for the purposes of marketing to consumers. As such, they would very likely have plenty of room for seven or eight letters of at least 12 mm height. As a result, the expert from the United Kingdom does not see a need to complicate the regulations by adding provisions for smaller sized lettering.
5. The expert from the United Kingdom proposes a minimum letter height of 12 mm in square brackets. This is identical to the specified minimum height in paragraphs 6.1.3.1 and 5.2.1.1. However, the United Kingdom expert is open to accepting a larger minimum size if this is the will of the Sub-Committee.
6. The United Kingdom expert proposes an application date of 1st January 2016 to coordinate with the expected date of mandatory application for sea transport.

Proposal

7. Amend paragraph 5.1.2.1 as follows (new text underlined) and a note at the end:

"5.1.2.1 An overpack shall be marked with the word "OVERPACK", with the proper shipping name and the UN Number and labelled, as required for packages by Chapter 5.2, for each item of dangerous goods contained in the overpack, unless markings and labels representative of all dangerous goods in the overpack are visible, except as required in 5.2.2.1.12. The lettering of the "OVERPACK" marking shall be at least [12 mm] high.

NOTE: The size requirement for the "OVERPACK" marking shall apply as from 1 January 2016."

8. Amend paragraph 5.2.1.3 as follows (new text underlined) and amend the existing note at the end:

"5.2.1.3 Salvage packagings shall additionally be marked with the word "SALVAGE". The lettering of the "SALVAGE" marking shall be at least [12 mm] high.

NOTE: The size requirement for the UN number marking and "SALVAGE" marking shall apply as from 1 January 2016."
