

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

17 June 2011

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

Dimension of marks and labels

Transmitted by the expert from Norway

Introduction

1. This document raises an issue in connection with the discussion on document ST/SG/AC.10/C.3/2011/5 (Description of labels, placards, symbols, markings and marks).

Background

2. We have experienced that different authorities in different countries do not interpret the text in the Models Regulation related to the possibility of reducing the dimension of certain labels and marks the same way. Especially the word “size” is interpreted differently by different authorities.

3. A single packaging of for example 10 litres or less is often used by professional users or consumers. The available space on the package for all the information that is required and necessary is limited. Such information includes transport labels or marks, consumer (GHS) labels and instructions of use.

4. In our opinion the intent of the Model Regulation is that the dimensions of marks and labels can be reduced when the volume or the shape of the package is such that it is difficult to apply a label or mark of 100 x 100 mm and at the same time have enough space for all the other information.

5. For a packaging of 10 litres or more there is normally no problem to put on a 100 x 100 mm label or mark. For a packaging of 5 litres or less there is often not enough space for the information that is required and necessary if a 100 x 100 mm transport label or mark has to be put on it.

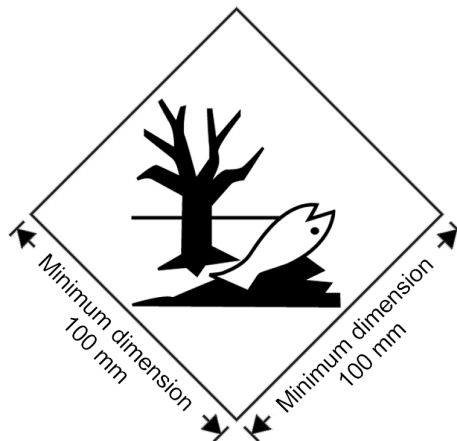
Proposal

6. In order to solve some of the problems of interpretation, it is proposed to mention in two paragraphs of the Model Regulations that the dimensions of certain marks or labels can be reduced on packages with a volume of [5] litres or less.

7. Paragraphs with proposed additional text. Text of paragraphs copied from document ST/SG/AC.10/C.3/2011/5 and the proposed new text is underlined and with bold letters:

5.2.1.6.3 The environmentally hazardous substance mark shall be as shown in Figure 5.2.2.

Figure 5.2.2



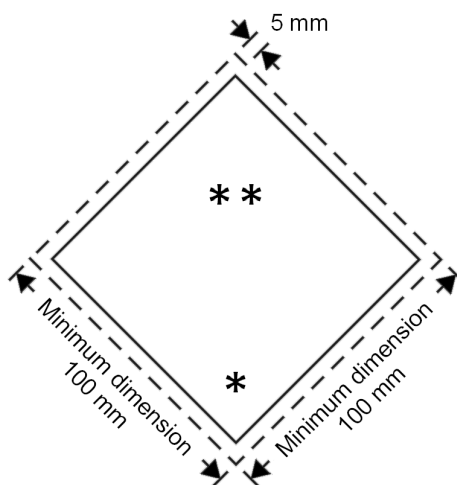
Environmentally hazardous substance mark

8. The symbol shall be in the form of a square set at an angle of 45 degrees (diamond-shaped) with all four sides the same length and all features shall be in proportion to those shown. The symbol (fish and tree) shall be on white or suitable contrasting background. The minimum dimensions shall be 100 mm x 100 mm and the minimum width of line forming the diamond shall be 2 mm. If the size of the package so requires, **or if the package has a volume of [5] litres or less**, the dimension may be reduced, provided the marking remains clearly visible.

NOTE: *The labelling provisions of 5.2.2 apply in addition to any requirement for packages to bear the environmentally hazardous substance mark.*

5.2.2.2.1.1 Labels shall be configured as shown in Figure 5.2.5. Labels shall be displayed on a background of contrasting colour, or shall have either a dotted or solid outer boundary line.

Figure 5.2.5



Class/division label

* Class or division number shall be shown in this location in the bottom corner.

** The class or division symbol/numeral/text shall be shown in this location.

5.2.2.2.1.8 If the size of the package so requires, **or if the package has a volume of [5] litres or less**, the dimensions may be reduced, provided the marking remains clearly visible. The line inside the edge shall remain 5 mm to the edge of the label. The minimum width of the line inside the edge shall remain 2mm. Dimensions for cylinders shall comply with 5.2.2.2.1.2.

9. The label shall be in the form of a square set at an angle of 45 degrees (diamond-shaped) with all four sides the same length. The minimum dimensions shall be 100 mm x 100 mm and the minimum width of the line inside the edge forming the diamond shall be 2 mm. The line inside the edge shall be parallel and 5 mm to the edge of the label. The line inside the edge on the upper half of the label shall be the same colour as the symbol and the line inside the edge on the lower half of the label shall be the same colour as the class or division number in the bottom corner.
