

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

8 October 2012

Forty-second session

Geneva, 3 – 11 December 2012

Item 2 (d) of the provisional agenda

**Recommendations made by the Sub-Committee on its thirty-ninth,
fortieth and forty-first sessions and pending issues:**

Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods

Marking of the date of manufacture with packagings of types 1H and 3H

**Transmitted by the International Confederation of Plastics Packaging
Manufacturers (ICPP)**

Background

1. On the fortieth session of the UN Sub-Committee in December 2011 the following supplement to paragraph 6.1.3.1 (e) was adopted by consensus on the basis of ICPP-paper ST/SG/AC.10/C.3/2011/36:

*6.1.3.1 (e) Insert a reference to note * at the center of the symbol and add the following note under the symbol:*

“ The last two digits of the year of manufacture may be displayed at that place. In such a case, the two digits of the year in the type approval marking and in the inner circle of the clock shall be identical.”*

2. In the discussion about suitable wording one sentence of the original ICPP-proposal got lost. However, this sentence is important for some manufacturers of drums and jerrycans: “Other methods that provide the minimum required information in a durable, visible and legible form are also acceptable.”

Justification

3. The technology of using a date wheel to emboss plastic items have been in existence since the early 1970's. Since that time newer more advanced technology has been introduced, used and perfected in the following 40 years.

4. The examples of other technologies are

(a) Etching - both laser and styles. These examples typically give more information than the “clock” often providing dates like line numbers, drum sequence numbers etc.

(b) Ink Jet with or without corona surface treatment. Again these generally provide more information than just the dates provided in an embossed clock.

Both of these methods are less subject to operator error than the embossment in that software can be programmed to hold the line until the proper information is programmed in.

Proposal

5. Designation of the current note in 6.1.3.1 (e) as Note 1.
 6. Addition of a Note 2 in 6.1.3.1 (e): “Other methods that provide the minimum required information in a durable, visible and legible form are also acceptable.”.
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