

**Committee of Experts on the Transport of Dangerous Goods  
and on the Globally Harmonized System of Classification  
and Labelling of Chemicals**

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**Sub-Committee of Experts on the  
Transport of Dangerous Goods**

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Item 11 (f) of the provisional agenda

**Issues relating to the Globally Harmonized System  
of Classification and Labelling of Chemicals:  
miscellaneous**

**Sub-Committee of Experts on the Globally Harmonized  
System of Classification and Labelling of Chemicals**

**Twenty-fifth session**

Geneva, 1 – 3 July 2013

Item 3 (d) of the provisional agenda

**Hazard communication issues:  
Miscellaneous**

**Size of GHS pictograms relative to transport labels and  
placards**

**Transmitted by the Dangerous Goods Advisory Council (DGAC)**

1. DGAC is concerned by the apparent practice of some offerors of dangerous goods and other substances subject to GHS to display non-transport hazard pictograms through the use of enlarged GHS pictograms (see the attached photo; note that the transport placard does not conform to the Model Regulations) on transport packagings such as portable tanks. In particular, DGAC is concerned about the potential for confusion in the case of transport where transport labels and placards play a critical role in alerting emergency responders in the event of an accident involving dangerous goods. The display of large GHS pictograms on such packages (freight containers, road vehicles, railway wagons/tanks and portable tanks) could be confusing for emergency responders during accidents or incidents involving shipments of dangerous goods and goods not designated as dangerous according to the UN Model Regulations. We invite the Subcommittees to consider whether this practice poses a safety concern that would warrant further clarification in the Model Regulations and the GHS.

2. With respect to labels, the GHS states:

“1.4.10.5 Allocation of Label Elements

1.4.10.5.1 Information required for packages covered by the UN Model Regulations on the Transport of Dangerous Goods

Where the UN Model Regulations on the Transport of Dangerous Goods pictogram appears on a label, the same pictogram for the same label should not appear. The GHS pictograms not required for transport of dangerous goods should not be displayed on freight containers, road vehicles or railway wagons/tanks.”

3. DGAC notes that with respect to the above bolded text, that portable tanks (specification and non-specification tanks) are not mentioned. In addition, the words “should not” are used so that the text is advisory and the application of GHS pictograms that are the same size as transport placards is not specifically prohibited on the mentioned transport units.

4. Annex 7 of the GHS provides illustrations of how GHS labels might appear on the same package with transport pictograms (designated as labels and placards under transport regulations). Example 7 in the Annex includes “Additional guidance when transport and other GHS information appear on a single packaging”. Paragraph (a) of the additional guidance states:

“(a) Where transport and other GHS information appear on a single packaging (e.g. a 200 l drum), consideration must be given to ensure that the label elements are placed in a manner that addresses the needs of the different sectors.”

5. The primary purpose of the guidance is to avoid confusion among users of GHS and transport pictograms. As paragraph (b) explains:

“(b) Transport pictograms must convey information immediately in an emergency situation. They must be able to be seen from a distance, as well as in conditions that are smoky or otherwise partially obscure the package;”

6. Paragraphs (c) and (d) go on to explain that GHS and transport pictograms are distinguished through differences in appearance and voluntary separation of the two types of pictograms.

7. Paragraph (e) refers to a voluntary adjustment in the size of GHS pictograms. Since GHS pictograms are of a size consistent with the size of text on labels, the GHS pictograms are generally smaller than the transport pictograms. However, since these pictograms are not required to be smaller than transport pictograms, and since they can be used and displayed separate from other label elements such as text denoting hazard statements, precautionary statements or danger words, DGAC is concerned that confusion will arise for single packagings and large road, rail or ocean bound transport units that display GHS pictograms similar in size to transport labels or transport placards.

8. DGAC is also concerned that the display of large GHS pictograms could create confusion in the case of large transport packages being used to transport goods not designated as dangerous according to the UN Model Regulations. Seeing a large GHS pictogram from a distance, through smoky conditions, could result in emergency responders erroneously concluding the presence of dangerous goods when in fact none are present. This could lead to inappropriate response actions.

9. For portable tanks where personnel may come into contact with chemicals during loading and unloading, industry’s standard means of meeting non-transport hazard communication requirements are to add labels (GHS or industry appropriate health and safety warnings meeting applicable requirements) to the external sealable openings. This conveys the hazard where appropriate, without impacting emergency responders.

10. While application of large pictograms on cargo transport units in the manner illustrated is not widely practiced, DGAC is concerned that if GHS and transport pictograms of similar size are presented on units in close proximity to each other, it could prove confusing for emergency responders during an accident or incident where clear communication is essential. DGAC invites the views of the two subcommittees, particularly on whether the text in 1.4.10.5.1 should be revised to:

- (a) account for portable tanks (UN tanks as well as non-specification tanks);
- (b) consider whether the text should be strengthened to prohibit colocation of GHS and transport pictograms of the same size on cargo transport units; and
- (c) consider whether the text should be further clarified to prohibit large GHS pictograms on large transport packagings or cargo transport units not being used to transport dangerous goods; and

- (d) consider whether the text should be further clarified to limit the size of GHS pictograms on any packagings to less than half of the size required for transport pictograms (note that special consideration may be appropriate for certain packagings such as gas cylinders with small shoulder labels); and
- (e) consider when adding portable tanks to paragraph 1.4.10.5.1 recommending GHS pictograms not be required on freight containers, road vehicles or railway wagons/tanks, to include an option to allow the attachment of small pictograms to external sealable openings, e.g., filling ports and outlet valves.

