

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

28 November 2013

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

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Geneva, 25 November – 4 December 2013

Item 5 (f) of the provisional agenda

**Miscellaneous proposals for amendments to the
Model Regulations on the Transport of Dangerous
Goods: marking and labelling**

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

Twenty-sixth session

Geneva, 4 – 6 December 2013

Item 3 (d) of the provisional agenda

Hazard communication issues: Miscellaneous

Large pictograms on transport packagings

Transmitted by the Dangerous Goods Advisory Council (DGAC)

1. Based on the information provided in document ST/SG/AC.10/C.3/2013/66, the TDG Sub-Committee noted that:
 - (a) It has been noticed that in the initial stages of the application of GHS provisions for supply and use through national and regional regulations, such provisions have been applied in the transport sector in a way contrary to both the transport and GHS provisions.
 - (b) Paragraph 1.4.10.5 of the GHS states, in part, “The GHS pictograms not required for the transport of dangerous goods should not be displayed on freight containers, road vehicles or railway wagons/tanks.”
 - (c) Annex 7 of the GHS illustrates the manner in which transport labels and GHS labels could appear on transport packages and example 7 of Annex 7 includes notes providing “Additional guidance when transport and other GHS information appear on single packagings” (e.g., steel drums).
 - (d) The above GHS provisions seek to reduce hazard communication conflicts that may arise resulting from the application of transport requirements and GHS provisions by other sectors.
 - (e) The primary concern for potential conflict arises from the application of GHS pictograms on transport packages when not included within a GHS label.
 - (f) This is regarded as contrary to the GHS itself in that the GHS indicates the GHS pictogram needs to be supplemented by additional information (see GHS 1.1.3.1.3, 1.1.3.1.4, GHS label definition in 1.2, and 1.4.10.5) and contemplates inclusion of GHS pictograms within a GHS label and not as a standalone element on a transport packaging.
 - (g) At the same time, the Subcommittee acknowledged, irrespective of 1.4.10.5, the need for GHS labels that include GHS pictograms on transport packages.
2. It was also noted that training and education is paramount in minimizing misunderstanding.

3. On the basis of the discussion, the Subcommittee, while not at this time endorsing specific text, considered the benefit of amplifying the relevant GHS provisions in its own regulations. This would more fully acknowledge the GHS provisions, in respect to their interrelationship between transport provisions and GHS related provisions by other sectors. The following is an example of how such text might appear in the UN Model Regulations and is provided for purposes of illustrating a possible way forward:

- (a) Adopt a new definition for “GHS Label” as it appears in Chapter 1.2 of the GHS;
- (b) Adopt a definition of a GHS pictogram as it appears in Chapter 1.2 of the GHS;
- (c) Include a new provision in line with the following:

[The application of marks and labels required by other national and international regulations for sectors other than transport, when applied to transport packages is recognised provided these marks and labels cannot be confused with or conflict with marks or labels required by these Regulations because of their size, colour, design or shape [adapted from ICAO 5.2.4.13]. Except when included in a GHS label, GHS pictograms shall not be displayed on cargo transport units or other transport packages.]
