



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 Globally Harmonized System of Classification and Labelling of Chemicals

Twenty-sixth session

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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

I. Introduction

1. The Sub-Committee will recall that, at its 25th session, DGAC provided an informal document (identified as INF.8 for GHS and INF.24 for TDG) inquiring into the acceptability of large pictograms on cargo transport units and packages in transport. The comments are summarized in paragraphs 45 to 47 of the report of the 25th session of the Sub-Committee.

2. DGAC noted that 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. The bolded sentence in the above text fails to provide for other types of “cargo transport units” which might also bear placards based on the requirements of the UN Model Regulations and modal regulations. This is understood to have been an oversight.

¹ In accordance with the report of the Sub-Committee of Experts on its twenty-fifth session (see document ST/SG/AC.10/C.4/50, paragraph 47).

Proposal

4. To account for the apparent oversight, DGAC proposes to amend paragraph 1.4.10.5.1 of the GHS by revising the second sentence to read as follows:

“The GHS pictograms should not be displayed on a cargo transport unit which, as defined by the UN Model Regulations, includes a road transport tank or freight vehicle, a railway transport tank or freight wagon, a multimodal freight container or portable tank, or a multi-element gas container (MEGC).”

NOTE: The location of a GHS label at the loading/unloading location of a cargo transport unit such as a portable tank or MEGC is acceptable.”
