

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

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Item 7 (f) of the provisional agenda

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

Comments on ST/SG/AC.10/C.3/2014/35 – Marking on packages (labels on cylinders)

Transmitted by the Compressed Gas Association (CGA)

Introduction

1. In ST/SG/AC.10/C.3/2014/35, the European Industrial Gases Association (EIGA) and the European Liquefied Petroleum Gas Association (AEGPL) propose amendments to the provisions in 5.2.2.2.1.2 addressing labels of reduced size for cylinders.
2. CGA supports in principle the proposal from EIGA and AEGPL and would like to propose some modifications to the wording.

Discussion

3. In paragraph 5 of ST/SG/AC.10/C.3/2014/35, EIGA and AEGPL propose the following amendment to the first sentence of 5.2.2.2.1.2:

“5.2.2.2.1.2 Cylinders for Class 2 may, on account of their shape, orientation and securing mechanisms for transport, bear labels representative of those specified in this section, which have been reduced in size, according to ISO 7225:2005, for display on the non-cylindrical part (shoulder) of such cylinders or on a fitting attached to the upper part of the cylinder or valve. ...”
4. From CGA’s understanding, as well as the photographs shown at the end of ST/SG/AC.10/C.3/2014/35, the intention is to allow for reduced-size labels on permanent attachments to the upper part of the cylinder (e.g. a collar) or reduced-size labels securely affixed to the cylinder valve (e.g. a tag).
5. CGA’s concern is that the proposed wording could allow for such labels to be placed on a cylinder valve transport cap or on shrink-wrap on the cylinder valve, both of which are intended to be removed for cylinder use. The wording should be clarified and amended to prevent such inadvertent misuse or potential abuse of the provision.
6. In addition, CGA would like to propose that the existing words “for Class 2” be deleted from the first sentence of 5.2.2.2.1.2, as cylinders are used to transport dangerous goods other than gases, such as liquids.

Proposal

7. CGA proposes the following modifications to the proposed amendments in ST/SG/AC.10/C.3/2014/35. (CGA's modifications to the original proposal are shown in double-underline and ~~double-strikethrough~~.)

"5.2.2.2.1.2 Cylinders ~~for Class 2~~ may, on account of their shape, orientation and securing mechanisms for transport, bear labels representative of those specified in this section, which have been reduced in size, according to ISO 7225:2005, for display on the non-cylindrical part (shoulder) of such cylinders, ~~or on a fitting attached~~ permanent attachment to the upper part of the cylinder (e.g. collar), or securely affixed to the cylinder valve (e.g. a tag). Labels may overlap to the extent provided for in ISO 7225:2005 "Gas cylinders – Precautionary labels", however, in all cases, the labels representing the primary hazard and the numbers appearing on any label shall remain fully visible and the symbols recognisable.

When the diameter of the cylinder is too small to permit the display of the reduced size labels on the non-cylindrical upper part of the cylinder, the reduced sized labels may be displayed on the cylindrical part."
