

## 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

24 November 2014

### Forty-sixth session

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Item 2 (d) of the provisional agenda

**Recommendations made by the Sub-Committee on its forty-third, forty-fourth and forty-fifth sessions and pending issues: transport of gases**

## Comments on ST/SG/AC.10/C.3/2014/83 – Marking on packages (labels on cylinders)

Transmitted by the Compressed Gas Association (CGA)

### Introduction

1. In ST/SG/AC.10/C.3/2014/83, 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 14 of ST/SG/AC.10/C.3/2014/83, EIGA and AEGPL propose the following additional text in the first sentence of 5.2.2.2.1.2, as well as in a new NOTE:

“5.2.2.2.1.2 Cylinders 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, on the exterior surface of a permanent attachment to the upper part of a cylinder (e.g. collar, handling device), or on a securely affixed attachment to the cylinder valve. ...

*NOTE: For cylinders intended for the carriage of gases No. 1965, hydrocarbon gas mixture liquefied, n.o.s., with a water capacity of 40 litres or less, labels reduced in size according to ISO 7225 may be displayed on the exterior surface of a securely affixed attachment to the upper part of the cylinder.*

...”

4. CGA is concerned that the proposed wording could allow for such reduced-size labels to be placed on a part of the cylinder package that is intended to be removed for cylinder use. CGA expressed similar concern in UN/SCETDG/45/INF.45 for the previous session in June/July 2014. If the label is placed on a securely-affixed (i.e. non-permanent) attachment that must be removed for withdrawal or use of the dangerous goods, such as a cylinder valve transport cap, then the cylinder may no longer be identified as containing dangerous goods when the attachment is removed, and there is also a risk that the

attachment and label could be placed on another cylinder package containing a different product, which could lead to misidentification of the dangerous goods.

5. In addition, in the proposed new note, a provision has been included for UN 1965, hydrocarbon gas mixture, liquefied, n.o.s.; it is CGA's understanding that this UN number and proper shipping name are commonly used in Europe. However, similar gases in the same cylinders addressed by this note are commonly transported in North America under other UN numbers and shipping names, including UN 1075, petroleum gases, liquefied, and UN 1978, propane. Other gases are also transported in the same cylinders. The proposed provision should not be gas-specific and should address only issues regarding physical configuration.

## Proposal

6. CGA proposes the following clarifications and modifications to the proposed additional text in ST/SG/AC.10/C.3/2014/83. (CGA's amendments to the original proposal are shown in double-underline and ~~double-strikethrough~~.)

“5.2.2.2.1.2 Cylinders 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, on the exterior surface of a permanent attachment to the upper part of the cylinder (e.g. collar, handling device), or on a securely affixed attachment to the cylinder valve that does not require removal for withdrawal or use of the dangerous goods. 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.

*NOTE: ~~For cylinders intended for the carriage of gases No. 1965, hydrocarbon gas mixture, liquefied, n.o.s., with a water capacity of 40 litres of or less, labels reduced in size according to ISO 7225:2005 may be displayed on the exterior surface of a securely affixed attachment to the cylinder that does not require removal for withdrawal or use of the dangerous goods, on the upper part of the cylinder.~~*

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.”