
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 6 (a) of the provisional agenda

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

Optical differentiation of labels/placards for gases

Transmitted by the expert from Spain and the International Association of Fire and Rescue Services (CTIF)

Introduction

1. In the July 2019 meeting Spain and CTIF presented a joint proposal for the optical differentiation of labels and placards for gases (see ST/SG/AC.10/C.3/2019/19).
2. The problem that Spain and CTIF intend to solve is that, for different labels corresponding to different classes, the labels can only be differentiated by the numbers indicated in the lower part of the label. This occurs for labels 2.1 and 3, and labels 2.3 and 6, and causes difficulties to distinguish the labels from a distance. Spain and CTIF proposed to differentiate these labels by including into the lower half of labels 2.1 and 2.3, the symbol corresponding to the gas bottle, that can now already be found in the upper half of label 2.2.
3. This modification of the labels would solve the difficulties for the first emergency responders (police, firefighters, etc) to distinguish easily one label from another. A possible mix up of the present labels could lead to erroneous responses at the site of an accident.
4. After the discussion of the proposal, it was decided to create an informal correspondence working group to continue the work of this topic (see ST/SG/AC.10/C.3.110, paragraphs 72-75).

Work of the correspondence working group

5. The correspondence working group is currently formed by 27 members, representing competent authorities, concerned industry and fire fighter associations. Spain and CTIF are very grateful for the interest in this topic, and the contributions received from the different members of the correspondence working group.
6. The correspondence working group has served, for the time being, mainly as a platform for the exchange of arguments for and against the general idea of amending the labels for class 2. A summary of the main aspects that have been discussed (but not an exhaustive list) is introduced in the following paragraphs.
7. Different aspects that would reinforce the need to differentiate the labels and placards of class 2 from others are:
 - (a) Visual differences improve easy recognition. Symbols can be easily interpreted, also by a wide public. Easy to read without specific training, increases awareness.

- (b) Improves safety message worldwide, specifically for first responders.
 - (c) Avoid mixing up of labels and wrong attachment.
 - (d) First responders are not a homogenous community, tasks, competence, equipment and training in dangerous goods vary.
 - (e) Safety distances in incidents involving gas are higher than involving liquids/solids, need to be aware of the hazard without approaching too much.
8. Different difficulties to modify the labels are:
- (a) Industry has 2 billion cylinders worldwide.
 - (b) The gas bottles themselves are easily recognizable as containing gas, even if gas tanks and other vehicles carrying gas bottles may not be as easily recognizable.
 - (c) Other sources of information may be available, which give a more complete information, but have to be decoded first:
 - (i) Orange plate, indicating UN number.
 - (ii) UN number written on the label in some areas.
 - (d) Transitional period:
 - (i) For labels, long transitional period would be needed to avoid costs, to change labels during periodic inspection.
 - (ii) Confusion may exist during the period of coexistence.
9. Additionally, some specific details were pointed out that should be taken into account when preparing a final proposal (consequential amendments, placement of texts, etc)

Continuation of work

10. Spain and CTIF would like to ask the Sub-Committee to convey a lunchtime working group for Friday the 6th December, to continue the discussions to try to reach a solution that accomplishes the objective of allowing an easy differentiation of the labels trying to avoid the disadvantages mentioned.
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