

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

15 June 2020

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

Fifty-seventh session

Geneva, 29 June-8 July 2019

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, comments
in response to ST/SG/AC.10/C.3/2020/39**

**Transmitted by the World LPG Association (WLPGA) and Liquid Gas
Europe (LGE)**

1. The LPG industry appreciates the work of Spain, CTIF and the group and welcomes the opportunity to comment on this issue.
 2. The exchanges in the working group and the related physical meetings resulted indeed to the proposal ST/SG/AC.10/C.3/2020/39 submitted by Spain and CTIF. While fully understanding the objectives of the proposal, the LPG industry is very hesitant for its acceptance. It sees this proposal as not necessary, considering that the objectives of the proposal can already be met by the existing regulation; reference also to UN/SCETDG/56/INF.40 submission in the Dec.2019 meeting.
 3. More specifically on the proposal document:
 - (a) Proposal 1: The addition of the “Gas cylinder symbol” does not provide the clarity that was initially intended for. The symbol can be well recognised by those who are adequately trained and understand its meaning, but not necessarily by others not sufficiently trained, those may even see it as cricket bat, as some had commented. During the Dec.2019 group meeting in Geneva this option had been largely rejected.
 - (b) Proposal 2: Adding text to the label (incl. UN number if needed), indeed it has merits as the proposal describes, but this is something this option is already today allowed by the regulation and indeed implemented by many countries as the proposal also describes. Countries who have not applied this yet, and they see it necessary, they can already apply it now in any configuration they see best, without any need for change in the regulation.
 - (c) Regarding labels on cylinders, modifying labels on more than 2 billion LPG cylinders globally in circulation (and many more of industrial gases), cylinders which are currently immediately identified by everyone as LPG/gas cylinders from their shape, just for making it clearer that the contents is indeed gaseous, adds absolutely no value. Any resources and efforts dedicated to this change will be clearly a waste.
 4. The LPG industry is looking forward to continuing the discussions.
-