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INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

**Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods**
(Bern, 28 May – 1 June 2001)

PROPOSAL TO AMEND THE TEXT OF THE RID/ADR

PART 5 – CHAPTER 5.2, section 5.2.2.2
Provisions for labels

Transmitted by the European Industrial Gases Association (EIGA) */

SUMMARY

| | |
|-----------------------------------|--|
| <i>Executive summary:</i> | This proposal aims at aligning the requirements in 5.2.2.2 for the labelling of cylinders with current industry practice by referring to the lay-out foreseen in ISO 7225. |
| <i>Action to be taken:</i> | Modify 5.2.2.2.1.2 with the proposed text |
| <i>Relevant documents:</i> | TRANS/WP.15/159/Add.4 |

Introduction

It is current practice in the Industrial Gases Industry to label gas cylinders with hazard symbols displayed and reduced in size according to ISO 7225:1994.

*/ Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT/III/2001/15.

The attachment shows an extract of ISO 7225 with the proposed displays of the diamonds and an example of how these ISO recommendations are put into practice.

At the request of EIGA, the reference to ISO 7225 for the reduced sizes of the hazard diamonds have been introduced both in the restructured ADR/RID and recently in the UN Recommendations.

Some members of EIGA have brought to the attention of EIGA that they have been fined after a roadside check because the hazard symbols are “overlapping”.

The justification for the fine is based on a rather restrictive reading of paragraph 5.2.2.1.6 that requires that

“Each label shall ...

(b) be so placed on the package that it is not covered or obscured by any part or attachment to the packaging or any other label or marking; and

(c) be displayed next to each other when more than one label is required”.

The understanding of the Gases Industry of this requirement is that the consigner should pay attention when affixing the labels on the cylinders not to obscure any other marking or label that are important for the safety of the transport or the use of the receptacles; but that the overlapping as outlined in the attachments does not mean that the hazard labels “obscure” one another.

In order to clarify the requirements, EIGA proposes to extend in 5.2.2.2.1.2 the reference to ISO 7225 to the display of the labels.

Proposal with new texts in bold underlined characters

Modify **5.2.2.2.1.2** as follows:

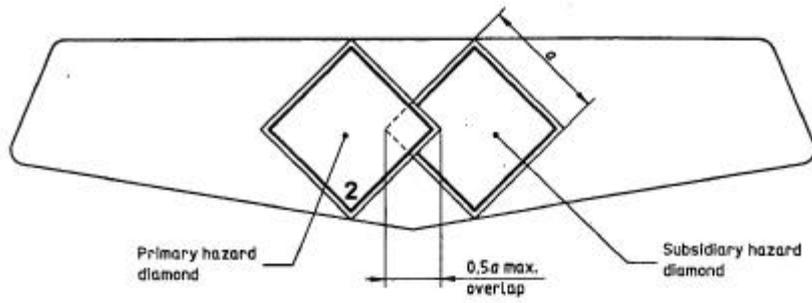
“Gas cylinders for Class 2 may, on account of their shape, orientation and securing mechanisms for transport, bear labels representative of those specified in this section, which have been reduced in size **and are displayed**, according to the dimensions **and the layout** outlined in ISO 7225:1994, “*Precautionary labels for gas cylinders*”, for display on the non-cylindrical part (shoulder) of such cylinders.”

Justification

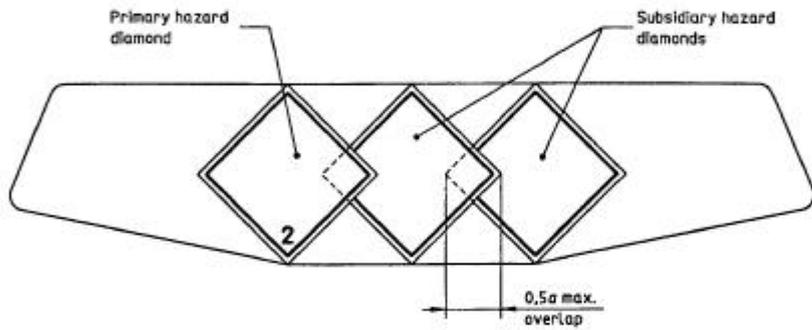
Safety: The existing level of safety will be maintained.

Feasibility: The proposal will clarify the text of the restructured ADR/ADR and align it with current industry practice.

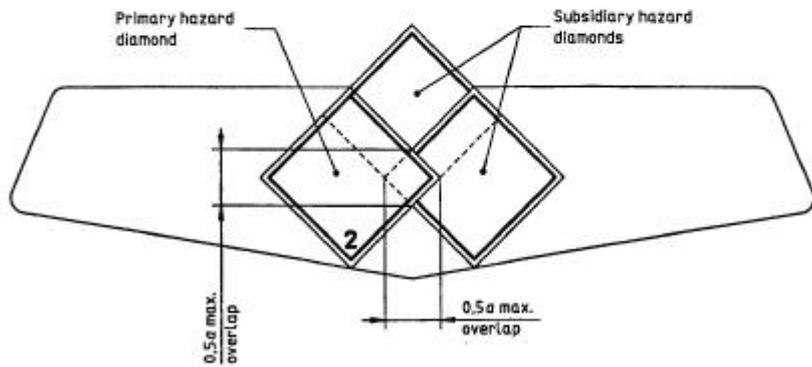
Enforceability: Enforcement will rely upon checking that shoulder labels for cylinders are in agreement with ISO 7225.



a) Primary and subsidiary hazard diamonds and double panel



b) Primary and two subsidiary hazard diamonds arranged in a line, and double panel



c) Primary and two subsidiary hazard diamonds arranged in a triangle, and double panel

Figure 2 — Arrangements of primary and subsidiary hazard diamonds and double panels

