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 Globally Harmonized System of Classification and Labelling of Chemicals

Twelfth session,
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Item 7 of the provisional agenda

Sub-Committee of Experts on the Transport of Dangerous Goods

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Item 6 of the provisional agenda

IMPROVEMENT OF HAZARD COMMUNICATION

Comments on UN/SCETDG/30/INF.5 and UN/SCEGHS/12/INF.2

Transmitted by the European Liquefied Petroleum Gas Association (AEGPL)

Current status

Three separate labels exist for Class 2 (gases).

Each label is characterized by a symbol (flame or cylinder or skull and crossbones, in black or white), a figure (“2”) and a background color (red, green or white).

CTIF asks for comments on the suggestion to show an additional gas-cylinder symbol on all gas labels.

In support of the current status

So far as LPG is concerned, adding a gas-cylinder symbol as a supplementary symbol on the label presents a major risk of confusion as the gas-cylinder is currently widely recognized as the indication for non flammable gases. In this configuration, the label would therefore be misleading. Moreover, to put a picture of a cylinder on a gas-cylinder serves no purpose whatsoever as the shape of the cylinder itself signifies its contents.

Given our comment above, the proposal would not present any benefit but would generate adverse side-effects (confusion).

AEGPL therefore supports maintaining the status quo.