

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

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LIMITED QUANTITIES (MULTIMODAL HARMONIZATION)

Transport of dangerous goods in limited quantities

Comments on ST/SG/AC.10/C.3/2008/17

Transmitted by the International Association of the Soap, Detergent and Maintenance Products
Industry (AISE) and the European Council of the Paint, Printing Ink and Artists Colours
Industry (CEPE)

Introduction

1. AISE and CEPE welcome the proposals from the Government of France to create a harmonised approach to the transport of dangerous goods in limited quantities set out in ST/SG/AC.10/C.3/2008/17.
2. However, we have some concerns about certain of the details in the proposals and propose some further changes.

Discussion

3. During the working party discussions which led to the French proposal, it was agreed that the only modal differences that should remain would be those generated by the technical constraints of air transport (e.g. internal air pressure in packages) and an indication that these special requirements are being met. The text in ST/SG/AC.10/C.3/2008/17 is too widely drawn and could allow other modal differences to be introduced.
4. We therefore believe that the new text should make it clear that the centre portion of the mark can only be used for indications relating to special technical requirements of air transport.
5. Although the mark would normally be 100mm x 100mm, provision should be made, as now, for a reduced size for application on smaller packages that cannot accommodate the full size.

6. There is no colour specified for the current limited quantities diamond mark with UN number(s). Although normally marks are printed in black, there are occasions when suppliers use a dark colour to match that used on the rest of the pack to save on two-colour printing. It would be helpful if the new design of mark could similarly be printed in a dark colour on a contrasting background.

7. AISE and CEPE therefore propose three amendments to the text shown in 3.4.7. of Annex 2 of ST/SG/AC.10/C.3/2008/17.

Proposal

8. 3.4.7 to be amended as follows:

3.4.7 Packages containing dangerous goods in limited quantities need not be marked with the proper shipping name of the contents, but shall be durably and legibly marked with the marking shown in Figure 1 below. The marking must be readily visible. Additional information relative only to the technical suitability of the packaging for transport by air (e.g. a numeric code or a pictorial symbol of an aeroplane as set out in the ICAO Technical Instructions) ~~nature of the goods~~ may appear in the center portion of the marking, ~~[when it is needed to identify certain groups of goods, for mode specific reasons (e.g. «ID 8000 consumer commodity» in the ICAO technical instructions)]~~.

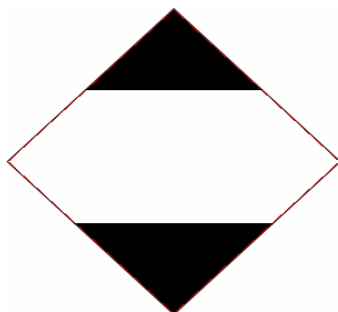


Figure 1 – Marking for packages containing limited quantities. Top and bottom portions must be black or a dark colour, center area white or suitable contrasting background. Dimensions: 100 mm x 100 mm. If the size of the pack so requires, the dimension may be reduced, provided the marking remains clearly visible. Minimum width of line forming diamond: 2 mm.
