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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MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Comments on ST/SG/AC.10/C.3/2009/33 (IATA) Application of hazard label for environmentally hazardous substances

Transmitted by the expert from Sweden

- 1. Sweden appreciates the proposal from IATA and we think the proposed amendments will clarify the situation when transporting substances that are environmentally hazardous.
- 2. However, we would like to suggest an amendment to the proposal. We propose to add that the "EHS mark" shall be located adjacent to the UN number, proper shipping name and the class 9 label.
- 3. In sub-paragraph 5.2.2.1.6 it is already stated that each label shall be located on the same surface of the package near the proper shipping marking, if the package dimensions are adequate.
- 4. Sweden therefore believes a solution to the problem is to slightly amend the existing 5.2.1.6.2.

Proposal

- 5. Amend 5.2.1.6.2 to read as follows (new text is bold and underlined):
 - 5.2.1.6.2 The environmentally hazardous substance mark shall be located adjacent to the markings required by 5.2.1.1 **and the class 9 label**. The requirements of 5.2.1.2 and 5.2.1.4 shall be met.