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## 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

#### Thirty-seventh session

Geneva, 21–30 June 2010

Item 5 of the provisional agenda

#### Miscellaneous proposals of amendments to the Model Regulations on the Transport of Dangerous Goods

### Proposal to clarify 5.2.2.2.1.2 Provisions for labels of cylinders for Class 2

Transmitted by the European Industrial Gases Association (EIGA)<sup>1</sup>

#### Background

1. Under 5.2.2.2.1.2 of Chapter 5.2 of the Model Regulation reduced size labels, (product warning signs) for cylinders are permitted. This is on account of their size and shape and for display on the non cylindrical part, (shoulder) of such cylinders.
2. In 5.2.1.6 there is a requirement for packages containing environmentally hazardous substances to “be durably marked with the hazardous substance mark”. This mark is shown in figure 5.2.2 of 5.2.1.6. This mark may be reduced in size on account of the package size.
3. The text in 5.2.2.2.1.2 states, “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...”
4. With the requirement to label substances that are environmentally hazardous with the “hazardous substance mark” it is considered that 5.2.2.2.1.2 requires clarification because it refers only to labels, but 5.2 covers “Marking and Labelling”.

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2009-2010 approved by the Committee at its fourth session (refer to ST/SG/AC.10/C.3/68, para. 118 (a) and ST/SG/AC.10/36, para. 14).

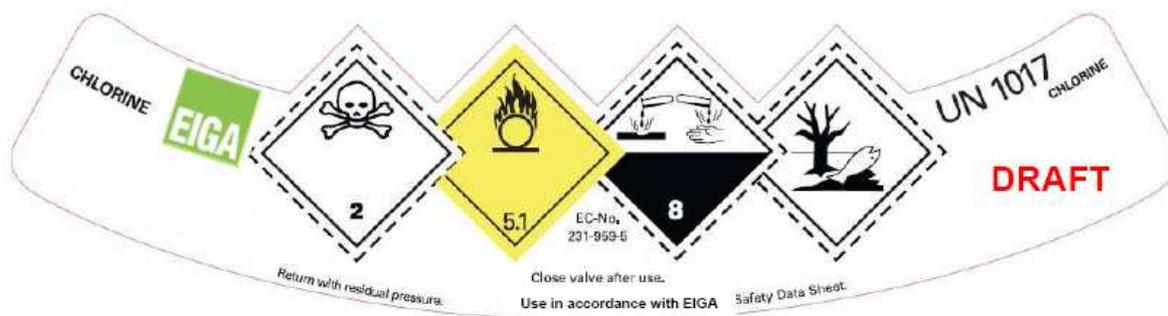
## Proposal

5. In order to clarify this, the proposal is to amend 5.2.2.2.1.2 with the addition of “and marks”.

Consequently 5.2.2.2.1.2 would read, (additional text in bold);

“5.2.2.2.1.2 Cylinders for class 2 may, on account of their shape, orientation and securing mechanisms for transport, bear labels **and the environmentally hazardous mark** representative of those specified in this section, which have been reduced in size according to ISO 7225:2005, for display on the non-cylindrical part (shoulder) of such cylinders. Labels **and the environmentally hazardous mark** may overlap to the extent provided for by ISO 7225: Gas cylinders- Precautionary labels”, however, in all cases the labels representing the primary hazard and the numbers appearing on any label shall remain fully visible and the symbols recognisable.”

An example of a label for a chlorine cylinder is shown below detailing the labels and environmentally hazardous mark:



## Justification

This amendment will clarify the position when applying the environmentally hazardous mark to cylinders.

## Safety implications

None foreseen.