

## 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

18 November 2011

### Fortieth session

Geneva, 28 November – 7 December 2011

Item 4 (c) of the provisional agenda

### Miscellaneous proposals of amendments to the

Model Regulations on the Transport of Dangerous goods: marking and labelling

## Comments on ST/SG/AC.10/C.3/2011/31 – Fumigation warning mark and coolant/conditioning unit warning mark

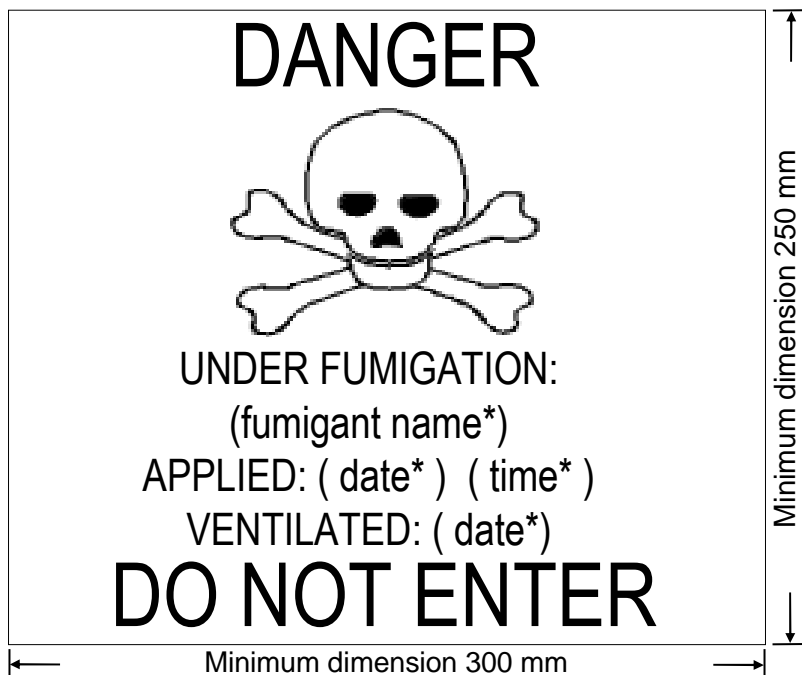
### Transmitted by the expert from Sweden

1. In document ST/SG/AC.10/C.3/2011/31, the expert from the United Kingdom is proposing modified requirements for the warning marks for fumigated units and units containing a coolant/conditioner in order to fit the required information into the warning marks, which is not possible with the requirements currently stated in the Model Regulations.
2. Sweden supports the proposals in principle. From our point of view, it is important to facilitate interpretation of the provisions and to eliminate any risk of uncertainty. However, Sweden believes that the proposed reduced lettering height requirement from 25 mm to 10 mm for the fumigation warning mark might be a bit too far-reaching and we think it would be more appropriate to align the requirements for the lettering height for this mark with those for the coolant/conditioning unit warning mark.
3. Additionally, the skull and crossbones symbol could be made more conspicuous. Sweden is of the opinion that this symbol is the most important feature in the warning mark, but with its current size the symbol tends to fade. The hazard related to the fumigated unit must be registered instantly by anyone regardless of language skills or ability to read and, therefore, Sweden believes that the skull and crossbones symbol could be enlarged in order to become more visible.
4. Furthermore, some of the text in the warning mark seems superfluous and could be removed without changing the hazard communication itself.
5. Finally, Sweden believes it would be appropriate to illustrate the warning mark with accurate proportions regarding the required minimum dimensions since the skull and crossbones symbol is required to be in proportion to the mark shown.

### Proposal

6. Taking into account the reasoning presented, the expert from Sweden proposes a revised fumigation warning mark where the description text is slightly modified. Amend **Figure 5.5.1** and the related explanatory text in document **ST/SG/AC.10/C.3/2011/31** under **Proposal 1** to read as follows (new text underlined):

“Figure 5.5.1



\* Insert details as appropriate.

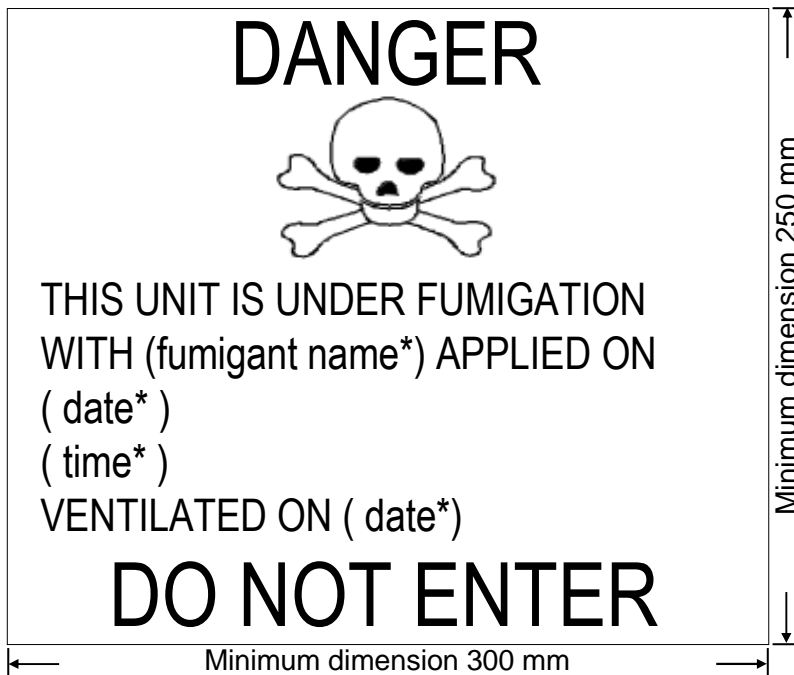
Fumigation warning mark

7. The marking shall be a rectangle. The minimum dimensions shall be 300 mm wide x 250 mm high and the minimum width of the outer line shall be 2 mm. The marking shall be in black print on a white background ~~with lettering not less than 10 mm high.~~ The words “DANGER” and “DO NOT ENTER” shall be at least 25 mm high, and the rest of the lettering shall be at least 12 mm high. The skull and crossbones symbol shall be in proportion to that shown.”.

**Alternative proposal**

8 If the revised warning mark proposed above is not considered to give enough information compared with the current mark, then the following fumigation warning mark is proposed as an alternative (description text remains unchanged from our first proposal):

“Figure 5.5.1



\* Insert details as appropriate.

Fumigation warning mark

9. The marking shall be a rectangle. The minimum dimensions shall be 300 mm wide x 250 mm high and the minimum width of the outer line shall be 2 mm. The marking shall be in black print on a white background ~~with lettering not less than 10 mm high.~~ The words “DANGER” and “DO NOT ENTER” shall be at least 25 mm high, and the rest of the lettering shall be at least 12 mm high. The skull and crossbones symbol shall be in proportion to that shown.”.