



**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****Forty-second session**

Geneva, 3 – 11 December 2012

Item 5 of the provisional agenda

**Global harmonization of transport of dangerous goods regulations
with the Model Regulations****Descriptions of labels, placards, symbols, markings and
marks: transitional measures****Transmitted by the expert from the United Kingdom¹****Background and discussion**

1. At the forty-first session of the Sub-Committee on the Transport of Dangerous Goods, the proposal from the expert from the United Kingdom to amend the provisions for various markings was adopted (ST/SG/AC.10/C.3/2012/32). It was stated during the meeting that transitional measures for at least some of the revised markings would be needed. This paper sets out proposals for each marking. Where amendments are made which may render existing stocks of markings non-compliant, a transitional date of January 2017 is provided. In most cases, this is expressed as allowing the provisions of the 17th revised edition to be applied up to the previous day, 31 December 2016. Where this is not the case, no transitional period is proposed and the normal transposition into the modal regulations is sufficient.

Proposal 1: Limited quantity marking

2. During the preparation of the proposal for amendment it became apparent that many existing LQ marking stickers had a black diamond of less than 100 mm x 100 mm to allow

¹ In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

manufacturers to avoid print bleeds. The amended text would remove the option of using those markings; a transitional measure will allow stocks of those stickers to be used up. Two notes are required; the first note is proposed to be placed beneath paragraph 3.4.7:

“NOTE: The provisions of 3.4.7 from the 17th revised edition of the Model Regulations may continue to be applied until 31 December 2016”.

3. The second note is proposed to be placed beneath paragraph 3.4.8:

“NOTE: The provisions of 3.4.8 from the 17th revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations may continue to be applied until 31 December 2016”.

Proposal 2: Excepted quantity mark

4. The proposal adopted for the EQ mark now explicitly states that it shall be a square. Therefore, a transitional date of January 2017 is proposed. The note is proposed to be placed under 3.5.4.3:

“NOTE: The provisions of 3.5.4.2 and 3.5.4.3 from the 17th revised edition of the Model Regulations may continue to be applied until 31 December 2016”.

Proposal 3: Environmentally hazardous substance mark

5. The amendment to the text for the EHS mark is similar to that for the LQ marking, so a transitional period of 1st January 2017 is also proposed. The note is proposed to be placed under 5.2.1.6.3:

“NOTE: The provisions of 5.2.1.6.3 from the 17th revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations may continue to be applied until 31 December 2016”.

6. This proposal also added a new provision for cargo transport units, so a transitional measure is provided under the new paragraph under 5.3.2.3.2:

“NOTE: The requirements of 5.3.2.3.2 shall apply as from 1st January 2017”.

Proposal 4: Orientation arrows

7. There is no amendment made to the specifications of these arrows that might make existing labels or packagings non-compliant. This is because no exact dimensions are specified. Therefore, no special transitional date is proposed.

Proposal 5: Class/division labels

8. The specifications for class/division labels have been heavily amended, therefore a transitional date of 1st January 2017 is proposed. The note is proposed to be placed under the new sub-paragraph 5.2.2.2.1.1.3:

“NOTE: The provisions of 5.2.2.2.1.1 from the 17th revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations may continue to be applied until 31 December 2016. When so applied, 5.2.2.2.1.1.1, 5.2.2.2.1.1.2 and 5.2.2.2.1.1.3 shall not apply until 31 December 2016”.

Proposal 6: Class/division placards (not Class 7)

9. The specifications for class/division placards are also considerably amended, so a transitional date of 1st January 2017 is also proposed. The note is proposed to be placed under the new sub-paragraph 5.3.1.2.1:

“NOTE: The provisions of 5.3.1.2.1 from the 17th revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations may continue to be applied until 31 December 2016”.

Proposal 7: Elevated temperature substance mark

10. Proposal 7 in ST/SG/AC.10/C.3/2012/32 was an alternative to proposal 6 which was not adopted. That proposal should not be confused with this proposal 7. The specifications for the elevated temperature substance mark now make explicit the need for the triangle to be equilateral. Therefore, a transitional period of 1st January 2017 is proposed. The note is proposed to be placed under 5.3.2.2:

“NOTE: The provisions of 5.3.2.2 from the 17th revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations may continue to be applied until 31 December 2016”.

Proposal 8: IBC and large packaging stacking load symbols

11. The amended text for stacking load symbols is amended in such a way to reduce the potential for distortion of the shape of the symbols. The transitional provisions are complicated by existing transitional provisions under 6.5.2.2.2 and 6.6.3.3. It is proposed to integrate a 1 January 2017 transitional date into the existing transitional measures, but not disallowing the option of applying the new provisions earlier. This is achieved by allowing the provisions of the 17th revised edition to be applied up to 31 December 2016.

12. For IBC stacking load symbols, the existing note under 6.5.2.2.2 is amended to maintain its current application and to allow for a new transitional date of 1st January 2017 for the revised 6.5.2.2.2:

“NOTE: The provisions of 6.5.2.2.2 shall apply to all IBCs manufactured, repaired or remanufactured as from 1 January 2011. The provisions of 6.5.2.2.2 of the 17th revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations may continue to be applied to all IBCs manufactured, repaired or remanufactured between 1 January 2011 and 31 December 2016”.

13. For large packaging stacking load symbols, the note under 6.6.3.3 is amended in a similar way:

“NOTE: The provisions of 6.6.3.3 shall apply to all large packagings manufactured, repaired or remanufactured as from 1 January 2015. The provisions of 6.6.3.3 from the 17th revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations may continue to be applied to all IBCs manufactured, repaired or remanufactured between 1 January 2015 and 31 December 2016.”.

Proposal 9: Mark shown in Packing Instructions P650 and P904

14. The only amendment to these packing instructions is to add dimensional arrows to the existing diagrams in P650 and P904. The same dimensional issues to LQ markings may apply to these marks. Therefore, a transitional period for those marks is required, which does not also apply to the rest of those packing instructions in case they should be otherwise amended before 2017. Therefore, a note is proposed below the diagrams in the packing instructions.

15. Add a note below the diagram in P650 as follows:

“NOTE: The mark shown in paragraph (4) of Packing Instruction P650 of the 17th revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations may continue to be applied until 31 December 2016”.

16. Add a note below the diagram in P904 as follows:

“NOTE: The mark shown in paragraph (2) of Packing Instruction P904 of the 17th revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations may continue to be applied until 31 December 2016”.

Proposal 10: Fumigation warning mark

17. The amendments adopted include a substantive amendment to the fumigation warning mark dimensions, so a transitional date of 1st January 2017 is proposed. A note is proposed to be placed under 5.5.2.3.2:

“NOTE: The provisions of 5.5.2.3.2 from the 17th revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations may continue to be applied until 31 December 2016”.

Proposal 11: Coolant/conditioning unit warning mark

18. The tightening of the wording of the coolant/conditioning unit warning mark is sufficient to require a 1st January 2017 transitional date. A note is proposed to be placed under 5.5.3.6.2:

“NOTE: The provisions of 5.5.3.6.2 from the 17th revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations may continue to be applied until 31 December 2016”.