
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

29 August 2012

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Geneva, 17-21 September 2012

Item 4 of the provisional agenda

Interpretation of RID/ADR/ADN

Question to the Joint Meeting regarding amendment of the ADR text, related to display of reduced size labels on Gas Cylinders

Submitted by AEGPL and EIGA

Background

1. According to 5.2.2.2.1.2 of ADR, "Cylinders for Class 2 may, on account of their shape, orientation and securing mechanisms for carriage, bear labels representative of those specified in this section, which have been reduced in size, according to the dimensions outlined in ISO 7225:2005, "*Gas cylinders -Precautionary labels*", for display on the non-cylindrical part (shoulder) of such cylinders"
2. These reduced dimension labels are affixed to the shoulder area of the cylinder to ensure that the label remains visible and undamaged when the cylinder is transported or stored. However, with the introduction of new cylinder designs, (and for practical purposes), other locations for the display of the labels have been introduced (see attached pictures). Although these alternative locations have advantages and meet the objectives of the specific precautionary labelling, there is concern that there may be an interpretation that they do not fully meet the requirements of the regulations. Specifically, in that in 5.2.1.1, there is a reference to the UN number and the letters UN corresponding to the dangerous goods may be displayed on the handling device, though not the hazard labels.
3. Due to the above, AEGPL and EIGA wish to have the opinion of the Joint Meeting regarding labels that are applied to other parts of the cylinder, such as the handling device. In all cases, such labels would be visible during transport.

Proposal/Further Work

4. If the Joint meeting considers that labels could be affixed in other areas apart from the shoulder, AEGPL and EIGA shall work together to prepare new text for inclusion in the UN Model Regulations for subsequent adoption the RID/ADR/ADN.

