

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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Item 7 (f) of the provisional agenda

Miscellaneous proposals of amendments to the Model Regulations on the Transport of Dangerous Goods: marking and labelling

Amendments to the proposed definitions of the terms “mark” and “label” in ST/SG/AC.10/C.3/2014/9

Transmitted by the observer from Romania

Introduction

1. The Romanian delegation wishes to thank the expert from the United Kingdom for the extensive work involved in the elaboration of the official document ST/SG/AC.10/C.3/2014/9. It is a very valuable effort of clarifying a set of provisions which was not clear to the users.
2. We noticed that the proposed definition for “mark” lacks one of its important visual elements, which is the “symbol”. Therefore, our proposal is to add the word “symbol” to this definition.
3. We also suggest the replacement of the word “numbers” with “figures” in the definition of the term “Mark”. The reasoning behind our proposal is the fact that the “figure/numeral” is the graphical symbol of a number, and it occurs as such in para. 5.2.2.2.2 Specimen label, in the text accompanying each label (e.g. “Figures: black; Numerals shall be about 30 mm in height”). Another editorial amendment is proposed with regard of the use of the repetition of “word”.
4. Concerning the use of the terms “package” and “packaging” in the definitions “Mark” and “Label”, we would prefer a clearer wording.
5. We think that a possible solution covering all aspects would be to insert a reference to the “package” in the definition of the “mark”. It is advisable also to replace “packaging” with “package” in the definition of the “label”.

Proposals

6. Amend the definition of “Mark”, as follows (new text is bold and underlined, deleted text is stricken out):

“Mark means a word(s) or words, symbol(s), letter(s), or figure(s)/numeral(s) ~~numbers~~ individually or in a sequence, or a pictogram(s), placed either directly (by e.g. stencilling, stamping, engraving, etching) on a package or packaging or a cargo transport unit, or appearing on a label or placard, and providing information about the dangerous goods contained, or about the packaging. *Marking* or *to mark* indicates the act of putting a mark in place.”

7. Amend the definition of “Label”, as follows (new text is bold and underlined, deleted text is stricken out):

Label means a piece of paper, plastic or other material affixed to ~~packaging~~ **package** and incorporating a mark or marks. *Labelling* or *to label* indicates the act of putting a label in place.
