



**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 Globally Harmonized
System of Classification and Labelling of Chemicals****Twenty-eighth session**

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Item 3 (d) of the provisional agenda

Hazard communication issues: Miscellaneous**Large GHS pictograms not in labels on portable tanks and
MEGC's while in transport****Transmitted by the Dangerous Goods Advisory Council (DGAC)¹****Introduction**

1. The Sub-Committee will recall that, at its 27th session, DGAC provided an informal document (INF.12) on the subject of large GHS pictograms on portable tanks and multi-element gas containers (MEGC's), while in transport. There was support to address the issue, however alternative ideas were provided to further develop the text. DGAC took note of the comments and is returning with this revised proposal.

Discussion

2. The original proposals by DGAC were aimed at a specific solution for portable tanks and MEGC's. These do not qualify for the exception from GHS labelling for transport conveyances in 1.4.10.5.1: "The GHS pictograms not required for transport of dangerous goods should not be displayed on freight containers, road vehicles or railway wagons/tanks." A solution is necessary because unlike other transport conveyances, portable tanks and MEGC's also serve as a package which may be parked and used for

¹ In accordance with the programme of work of the Sub-Committee for 2013–2014 approved by the Committee at its sixth session (see ST/SG/AC.10/40, para. 14, and ST/SG/AC.10/C.4/48, Annex IV, item 2(a)).

indefinite periods in supply and use after transport has ceased. It was therefore noted that any solution for transport should avoid unintended consequences for supply and use.

3. Another portion of the GHS which bears on this scenario is Annex 7, example 7. This example discusses the inter-relation and complementary goals of hazard communication for GHS and dangerous goods where they appear together on a single packaging. Of particular interest to this discussion is paragraph (e) on relative size of transport and GHS pictograms:

"(e) The pictograms may be distinguished by adjusting their size. Generally speaking, the size of the non-transport pictograms should be proportional to the size of the text of the other label elements. This would generally be smaller than the transport-related pictograms, but such size adjustments should not affect the clarity or comprehensibility of the non-transport pictograms;"

4. The example photos previously provided for portable tanks show GHS pictograms without text elements, of an identical size as transport pictograms and placed adjacent to the transport placards. This is not appropriate in transport. Taking note of the comments of the Sub-Committee, DGAC is proposing a more general solution for transport conditions which would address portable tanks, MEGC's and other scenarios which could be identified in the future. The solution would be, in transport only, to prohibit the use of GHS pictograms unless as part of a complete GHS label (see 1.4.10.5.4.2 and 1.4.10.5.3), and to prescribe that the GHS pictogram present in its label be relatively smaller than the transport pictogram, subject to general requirements for continued effectiveness of the GHS pictograms, parallel to the text of example 7 paragraph (e).

Proposal

5. Insert a new paragraph 1.4.10.4.4 in Chapter 1.4 of the GHS to read as follows:

1.4.10.4.4 Use of GHS pictograms during transport

For transport, a GHS pictogram not required by the UN Model Regulations on the Transport of Dangerous Goods should only appear as part of a complete GHS label (see 1.4.10.5.4.1), and not independently as may be the case for a transport pictogram. The size of the GHS pictograms should be proportional to the size of the text of the other label elements, and should be smaller than the transport-related pictograms to create a visual distinction. Such size adjustments should not affect the clarity or comprehensibility of the non-transport pictograms."
