

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 6 (a) of the provisional agenda

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

Size of the marking of the UN number on packages

Submitted by the International Air Transport Association (IATA)

Introduction

1. According to the second sentence of 5.2.1.1,
“The UN number and the letters “UN” shall be at least 12 mm high, except for packages of 30 litres capacity or less or of 20 kg maximum net mass and for cylinders of 60 litres water capacity when they shall be at least 6 mm in height and except for packages of 5 litres or 5 kg or less when they shall be of an appropriate size”
2. This sentence has been the subject of much discussion since the adoption of the minimum dimensions at the thirty-fifth session of the Sub-Committee. In the absence of an ideal solution at the forty second session of the Sub-Committee, it was decided to use the text taken from RID, ADR and ADN, which referred to capacity for liquids and the maximum nett mass for solids.
3. Feedback from industry demonstrates that the current text is not easily understandable and causes much confusion. Other sections within the Model Regulations make reference to minimum dimensions, making allowances where the package dimensions may be inadequate and this is described in much clearer language, for example:
 - The environmentally hazardous substance mark 5.2.1.6.3 “If the size of the package so requires, the dimensions/line thickness may be reduced, provided the mark remains clearly visible.”
 - The lithium battery mark 5.2.1.9.2 “If the size of the package so requires, the dimensions/line thickness may be reduced to not less than 105 mm wide x 74 mm high.”
 - Provisions for labels 5.2.2.2.1.1.3 “If the size of the package so requires the dimensions may be reduced proportionally, provided the symbols and other elements of the label remain clearly visible.”

Proposal

4. The Sub-Committee is invited to consider the following proposed text:

“The UN number and the letters “UN” shall be at least 12 mm high. If the size of the package so requires, the dimensions may be reduced, provided the mark remains clearly visible.”

Or,

“The UN number and the letters “UN” shall be at least 12 mm high. If the size of the package so requires, the dimensions may be reduced to not less than 6 mm high.”
