

**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals**

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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**

**Proposal for amendment to 5.2.2.2.1.3 and
5.2.2.2.1.5 UN Model Regulations**

Transmitted by the expert of the Russian Federation





Introduction

1. As is known, the label according to the model No. 9A "Lithium batteries and elements" first appeared in the 19th edition of the UN Model Regulations (2015).

2. The emergence of the label of hazard model No. 9A was reflected in particular paragraphs 5.2.2.2.2 and 5.2.2.2.1.3, than somewhat violating the logic of the statement of prescriptions in this paragraph. In the second sentence of paragraph 5.2.2.2.1.3 for some unknown reason separate data of the upper and lower half of the symbol of the label model № 9A are described, which are then completely duplicated in paragraph 5.2.2.2.2 and twice indicated the order of the location of the numbers of the class "9" at the bottom of the of the label:

«**5.2.2.2.1.3** With the exception of labels for divisions 1.4, 1.5 and 1.6 of Class 1, the upper half of the label shall contain the pictorial symbol and the lower half shall contain the class or division number 1, 2, 3, 4, 5.1, 5.2, 6, 7, 8 or 9 as appropriate. **However, for label model № 9A**, the upper half of the label shall only contain the seven vertical stripes of the symbol and lower half shall contain the group of batteries of the symbol and the **class number**. **Except for label model № 9A**, the label may include such text as the UN number, or words describing the hazard class (e.g. «flammable») in accordance with 5.2.2.2.1.5 provided that the text does not obscure or detract from the other required label elements.»

3. As for paragraph 5.2.2.2.1.5, it states that "on labels other than those for material of Class 7, the optional insertion of any text (other than the class or division number) in the space below the symbol shall be confined to particulars indicating the nature of the hazard and precautions to be taken in handling. For label 9A, no text other than the class mark shall be included in the bottom part of the label". That is, in brackets we are talking about the labels of class 7, having the upper and lower half of the symbol, which physically will not allow them to put any optional text under the symbol (the type of hazard and precautionary measures that must be observed when handling the cargo, UN number):

| Label model No. | Division or Category | Symbol and symbol colour | Background | Figure in bottom corner (and figure colour) | Specimen labels | Note |
|--------------------------------------|----------------------|--------------------------|-------------------------------------------------------|---------------------------------------------|------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Class 7: Radioactive material | | | | | | |
| 7A | Category I | Trefoil: black | White | 7 (black) |  | Text (mandatory), black in lower half of label: "RADIOACTIVE" "CONTENTS ..." "ACTIVITY ..." One red vertical bar shall follow the word: "RADIOACTIVE" |
| 7B | Category II | Trefoil: black | Upper half yellow with white border, lower half white | 7 (black) |  | Text (mandatory), black in lower half of label: "RADIOACTIVE" "CONTENTS ..." "ACTIVITY ..." In a black outlined box: "TRANSPORT INDEX"; Two red vertical bars shall follow the word: "RADIOACTIVE" |
| 7C | Category III | Trefoil: black | Upper half yellow with white border, lower half white | 7 (black) |  | Text (mandatory), black in lower half of label: "RADIOACTIVE" "CONTENTS ..." "ACTIVITY ..." In a black outlined box: "TRANSPORT INDEX"; Three red vertical bars shall follow the word: "RADIOACTIVE" |
| 7E | Fissile material | - | White | 7 (black) |  | Text (mandatory): black in upper half of label: "FISSILE"; In a black outlined box in the lower half of label: "CRITICALITY SAFETY INDEX" |

4. Thus, the new sign 9A completely falls under the criteria of paragraph 5.2.2.2.1.5 - that is, it has the upper and lower half of the symbol, which physically will not allow any optional text to be placed on it under the symbol (the type of the hazard and precautions that are necessary comply with the handling of goods, UN number).

Proposal

5. In order to exclude the repetition of the information in 5.2.2.2.1.3 and 5.2.2.2.2 and to exclude the violation of the requirements presentation structure in paragraphs 5.2.2.2.1.3 and 5.2.2.2.1.5, we propose that the text of paragraphs 5.2.2.2.1.3 and 5.2.2.2.1.5 shall be reworded as follows:

«**5.2.2.2.1.3** With the exception of labels for divisions 1.4, 1.5 and 1.6 of Class 1, the upper half of the label shall contain the pictorial symbol and the lower half shall contain the class or division number 1, 2, 3, 4, 5.1, 5.2, 6, 7, 8 or 9* as appropriate. ~~However, for label model No 9A, the upper half of the label shall only contain the seven vertical stripes of the symbol and lower half shall contain the group of batteries of the symbol and the class number.~~ Except for label model No 9A, Label may include such text as the UN number, or words describing the hazard class (e.g. «flammable») in accordance with 5.2.2.2.1.5 provided that the text does not obscure or detract from the other required label elements.»

**Symbol of label according to model No. 9A consists of the upper and lower halves (see 5.2.2.2.2).*

«**5.2.2.2.1.5** On labels other than those for material of Class 7 **and label model No 9A**, the insertion of any text (other than the class or division number) in the space below the symbol shall be confined to particulars indicating the nature of the hazard and precautions to be taken in handling.»

Justification

6. This amendment simplifies the correct interpretation of paragraphs 5.2.2.2.1.3 and 5.2.2.2.1.5 and eliminates repetitive information in points 5.2.2.2.1.3 and 5.2.2.2.2.

Difficulties

7. Any difficulty with ensuring the application of the amendment is not expected. After the adoption of this amendment, the text of the documents of the next level should be corrected.
