

**Sub-Committee of Experts on the
Transport of Dangerous Goods**
(Nineteenth session,
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Labelling of gas cylinders

Proposed modification to the proposal in ST/SG/AC.10/C.3/2001/1 (Austria)

Transmitted by the European Industrial Gases Association (EIGA)

SUMMARY

- Executive summary:*** Austria has submitted a proposal to allow the overlapping of labels on the shoulder of gas cylinders. EIGA strongly supports the principle of this proposal, but recommends making the reference to standard ISO 7225 more limited, in line with the decision made at the last Joint Meeting of the RID/ADR.
- Action to be taken:*** Modify 5.2.2.2.1.2 by adding the text given in this paper.
- Relevant documents:*** ST/SG/AC.10/C.3/2001/1 and ST/SG/AC.10/27/Add.1

Discussion

Document ST/SG/AC.10/C.3/2001/1 sets out clearly the problems faced by the industrial gas industry when using its well-established practice of overlapping the labels which appear on cylinder shoulders.

A proposal very similar to that given in paper 2000/1 was made by EIGA to the Joint Meeting of the RID Safety Committee and the Working Party on the Transport of Dangerous Goods held in May 2001. The meeting supported the idea of allowing overlapping labels, but was unhappy to allow all the variants described in ISO 7225; 1994. In particular, the competent authorities objected to the variant shown in figure 2 (c) of the standard which is reproduced at the end of this paper. Accordingly, new text was developed during the meeting and agreed for the ADR and RID. This text is recommended for inclusion in the Model Regulations in preference to the text proposed by Austria. This text ensures that all the elements of hazard communication will be fully realised in all cases where labels overlap.

Proposal

The current text of 5.2.2.2.1.2 in the 12th Revision reads:

“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 ISO 7225:1994, for display on the non-cylindrical part (shoulder) of such cylinders.”

It is proposed that the following additional sentences be added to 5.2.2.2.1.2.

Notwithstanding the provisions in 5.2.2.1.6, labels may overlap to the extent provided for by ISO 7225:1994. However, in all cases, the primary hazard label and the numbers appearing on any label shall remain fully visible and the symbols recognisable .
