



**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****Forty-fifth session**

Geneva, 23 June – 2 July 2014

Item 7 (f) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: marking and labelling****Marking requirements in Chapter 3.3 special provisions****Transmitted by the expert from the United Kingdom¹****Background**

1. Following discussion of the Secretariat's comments on issues raised by the RID/ADR/ADN harmonisation working group (informal document INF 37) at the forty-third session, the expert from the United Kingdom agreed to submit a paper to clarify requirements on the size for marking required in special provisions (para 88, ST/SG/AC.10/C.3/86). This was because delegates expressed uncertainty about minimum requirements for the additional package marks specified in some special provisions.
2. The Model Regulations set out specifications for the size of alphanumeric marks at 5.2.1.1 (for proper shipping name, UN number) and 6.1.3.1 (for packaging code). These provide three options for marking, according to the size of the package. The norm is a minimum of 12 mm high, but for packages of 30 litres/30 kilos net mass this may be reduced to a minimum of 6 mm, while very small packages of 5 litres/5 kilos net mass the marks "shall be of an appropriate size."
3. In the United Kingdom's view, the only special provisions which include package marking requirements which would not be covered by these general rules are as follows:

¹ In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

- 188 (f) – information about lithium batteries;
- 376 – “Damaged/Defective Lithium-ion Batteries” or “Damaged/Defective Lithium Metal Batteries”;
- 377 for “Lithium Batteries for Disposal” or “Lithium Batteries for Recycling”.

(NB. The expert from the United Kingdom notes that the 376 text is mainly in lower case and the 377 text is in upper case. This should surely be standardised on one or the other.)

4. The expert from the United Kingdom has also noticed that one packing instruction in Chapter 4.1.4 stipulates specific marking for packages (PP70 in P137 “THIS SIDE UP”). This gives no indication of size, but in our view would in any case more appropriately be replaced by a non-linguistic alternative, i.e. a reference to the orientation arrows at 5.2.1.7.1. As this special packing provision relates only to Class 1, this should be considered by the Working Group on Explosives.

5. The expert from the United Kingdom suggests that a reference to 5.2.1.1 could be adopted to cover the wording “lithium metal/ion” in 188 (f) (i) and the requirements of 376 and 377. A reference to 5.2.1.2 could apply to other marks (such as the additional requirements of 188 (f)). To future proof the text, this is better done generically rather than on a case by case basis.

6. The Sub-Committee’s views are therefore sought on the proposal set out below.

Proposal

7. Add the following second sentence to 3.3.1:

“Where a special provision includes a requirement for package marking, the provisions of 5.2.1.2 (a)-(d) shall be met. If the required mark is in the form of specific wording indicated between speech marks (“), such as “Damaged Lithium Batteries”, the minimum size of the mark shall be determined in accordance with the specifications set out in 5.2.1.1, unless otherwise indicated in the special provision or elsewhere in these Regulations.

8. In P137, PP70 replace:

“... the package marked “THIS SIDE UP”

with

“... the package be marked in accordance with 5.2.1.7.1”

Justification

9. These amendments would clarify the requirements for alphanumeric marks on packages.

Pictorial marks should be used whenever possible to facilitate understanding for international transport.
