



**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****Fifty-ninth session**

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Item 3 of the provisional agenda

Listing, classification and packing**Reviewing the location of the UN specification marking****Transmitted by the expert from China*****Introduction**

1. According to 6.1.3.1 of the Model Regulations, the UN specification markings shall be placed in the suitable locations:

“6.1.3.1 Each packaging intended for use according to these Regulations shall bear marks which are durable, legible and placed in a location and of such a size relative to the packaging as to be readily visible. For packages with a gross mass of more than 30 kg, the marks or a duplicate thereof shall appear on the top or on a side of the packaging. ...”

Explanation

2. The Model Regulations allow packages to have a UN specification marking on their tops. However, in fact, the entire top of some packagings is a removable top head, such as 1G, 1A2, etc. If the UN specification marking is only marked on the head, it is not rigorous enough, and it may lead to get head mixed up just like “to put the cap on the wrong head”. This can bring safety risks.

* A/75/6 (Sect.20), para. 20.51

3. The following figures show an example of a UN specification mark only displayed on the top of the 1G packaging.



Proposal

4. To ensure the integrity and compliance of UN packaging, it is recommended that the UN specification mark should be marked on the side when the top is a removable head.
5. Amend 6.1.3.1 to read as follows (new text is bold and underlined):

“6.1.3.1 Each packaging intended for use according to these Regulations shall bear marks which are durable, legible and placed in a location and of such a size relative to the packaging as to be readily visible. For packages with a gross mass of more than 30 kg, the marks or a duplicate thereof shall appear on the top or on a side of the packaging. **If the head on the top is removable, the marks or a duplicate thereof shall appear on at least a side of the packaging.**”
