

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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Sub-Committee of Experts on the Transport of Dangerous Goods

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Item 3 of the provisional agenda

Listing, classification and packing

Complementary proposal for ST/SG/AC.10/C.3/2021/52

Transmitted by the expert from China

Introduction

1. Clause 6.1.3.1 requires that packages shall allow the marks to be “placed in a location and of such a size relative to the packaging as to be readily visible” and that “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.” This implies that for packages with a gross mass of 30 kg or less, the marking can be on the top, side or bottom of a packaging.
2. In document ST/SG/AC.10/C.3/2021/52, it was proposed to add the provision “**If the head on the top is removable, the marks or a duplicate thereof shall appear on at least a side of the packaging.**” However, for a removable head package with a gross mass of 30 kg or less, marking on the bottom only is permitted. The newly proposed clause will introduce an unintended requirement of an additional marking on the side.
3. China has received the kindly remark from Canada about this issue and decided to substitute the proposal in ST/SG/AC.10/C.3/2021/52 with that in this paper.

Proposal

4. China proposes to 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. **For packages with removable heads, the marking shall not be displayed only on the removable head.**”
