



**Economic and Social
Council**

**Distr.
GENERAL**

**TRANS/WP.15/AC.1/1999/28
11 June 1999**

Original: ENGLISH

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

**Working Party on the Transport
of Dangerous Goods**

**Joint Meeting of the RID Safety Committee
and the Working Party on the Transport of
Dangerous Goods**
(Geneva, 14-24 September 1999)

RESTRUCTURING OF RID/ADR

PART 5, SUBSECTION 5.2.2.2: PROVISIONS FOR DANGER LABELS

Transmitted by the European Industrial Gases Association (EIGA) */

EIGA wishes to give the following comments on the proposal TRANS/WP.15/AC.1/1999/14 from Austria:

The proposal from Austria aims at clarifying in paragraph 5.2.2.2.1.2 what is meant by labels “reduced in size”. Paragraph 5.2.2.2.1.2 has been drafted by consolidating two marginals: marginal 2224(3) for reduced labels on cylinders of class 2 and marginal 3900(2) for reduced labels on packages of other classes.

*/ Distributed by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/1999/28.

EIGA welcomes the objective of the Austrian proposal to refer to the European Directives on classification and labelling in order to have consistency between the requirements for the labelling of the packagings for the use of the product with those for the transport of the product. This is particularly important in the case where the packaging is at the same time the packaging for transport and the packaging for use; in that case the European Directives refer to the “rules on the transport of dangerous substances” (see art. 24 (6) b of Directive 67/548 and art 8(5)b of Directive 88/379).

However, in those two European Directives, the issue of reduced label sizes in the case of gas cylinders has been clarified by referring to the relevant prescriptions of ISO 7225 which are reproduced hereafter:

Cylinder outside Diameter	Minimum length of side of diamond
D (mm)	a (mm)
D < 75	10
75 ≤ D < 180	15
D ≥ 180	25

Proposal

EIGA proposes to replace in the first sentence of 5.2.2.2.1.2 the words “*as appropriate*” with “*according to the dimensions outlined in ISO 7225*”.

In the second sentence, “*If the size of the packages*” should be amended to read: “*If the size of **other** packages*” in order to make clear that the case of the gas cylinders is covered by the first sentence and is not included in the scope of the second sentence that is clarified by the proposal from Austria.
