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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  
(Nineteenth session, 2-6 July 2001,  
agenda item 2)

ADDITIONAL PROVISIONS FOR THE TRANSPORT OF GASES

Labelling of gas cylinders according to Standard ISO 7225:1994

Transmitted by the observer from Austria

Discussion

1. In 5.2.2.1.6 (b) of the UN Model Regulations it is inter alia stated that labels be so placed on the packaging that they are **not covered** by any other label.
2. In 5.2.2.2.1.2 it is stated that gas cylinders for Class 2 may bear labels which have been **reduced in size**, as appropriate, for **display on the non cylindrical part (shoulder)** of such cylinders.
3. **International Standard ISO 7225:1994 "Gas cylinders - Precautionary labels"** which, according to its introduction, has been prepared in conformity with the UN Recommendations as well as with the IMDG-Code, ICAO-TI, etc. states that
  - in configurations in which the hazard diamonds overlap, the primary hazard diamond **shall partially cover** the subsidiary hazard diamond(s) (*see 3.1 of the Standard; the extent of overlapping is clearly indicated in figures*) and

- the labels (*with the hazard diamonds*) shall be located **by preference on the shoulder**. If necessary, they may be located **on the side of the cylinder** at a point approximately two-thirds of the distance from the cylinder base to the top of the valve or cap (*see 4.3 of the Standard; location on the side usually pertains to very small gas cylinders*).
4. According to the provisions of the Standard mentioned above millions of gas cylinders are transported world-wide which
- bear labels partially covering each other and
  - are reduced in size and displayed on the side of the cylinder.
- This practice, in the legal sense, is to be seen as **in contradiction to legal provisions** which implement the provisions in 5.2.2 of the model regulations mentioned above. Control authorities may therefore feel obliged to deal with it as an infraction to the law and stop transports.
5. Starting from the assumption that the legal contradiction outlined above was **not intended** (*the text in 5.2.2.1.6 (b) was introduced into the model regulations in 1997 i.e. at a time when the ISO-Standard 7225:1994 was already in force*) it should be clearly stated in the model regulations that labelling according to ISO Standard 7225:1994 be deemed in accordance with the provisions in 5.2.2 of the model regulations.
6. This can be done by introducing a reference to 5.2.2.2.1.2 into 5.2.2.1.6 and rewording of 5.2.2.2.1.2 taking account of the existing world-wide Standard ISO 7225:1994.

### **Proposals**

7. In light of the foregoing, the Sub-Committee is invited to consider the following proposals.
- 7.1 The beginning of 5.2.2.1.6 shall read:
- "Unless provided otherwise in 5.2.2.2.1.2 each label shall:"
- 7.2 5.2.2.2.1.2 shall read:
- "Gas cylinders for class 2 may, on account of their shape, orientation and securing mechanisms for transport, bear labels representative of those specified in this section, which have been reduced in size and placed, according to the dimensions and the specifications for application outlined in ISO 7225:1994, Gas cylinders - Precautionary labels."
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