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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

<u>Sub-Committee of Experts on the Transport of Dangerous Goods</u>

Twenty-fifth session, 5-14 July 2004 Item 12 (c) of the provisional agenda

HARMONIZATION WITH THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

Physical hazards

A new label for Division 5.2 Comments on ST/SG/AC.10/C.3/2004/21

Transmitted by the expert from the Russian Federation

1. Background

At the twenty-fourth session of the Sub-Committee, the expert from Norway submitted document ST/SG/AC.10/C.3/2003/33 containing a proposal for a different label for Division 5.2.

The proposal was based on the fact that the labels for Divisions 5.1 and 5.2 are practically identical, except for the figures in the bottom corner (5.1 and 5.2 respectively). This similarity is a problem for proper emergency action in case of incidents/accidents. The expert from Norway correctly points out that dangerous goods of Divisions 5.1 (oxidizing agents) and 5.2 (organic peroxides) have different properties. Substances of Division 5.1, as a rule, are not combustible materials; whereas substances of Division 5.2 are, to a different extent, combustible materials like many other organic substances.

Therefore, the expert from Norway considers that the dangerous goods of the two divisions of Class 5 should be identified by different labels for better hazard communication.

The expert from Norway proposes a new label of Division 5.2, which, compared to that used now, has its upper part coloured in red, thus warning of the combustible nature of organic peroxides.

2. Proposal

The expert from the Russian Federation agrees with the proposal by the expert from Norway as regards the necessity to change the appearance of the Division 5.2 label and with the justification contained in document ST/SG/AC.10/C.3/2004/21.

However, the expert from the Russian Federation is of the opinion that the red colour should be used not in the upper part, but in the lower part of the label. This opinion is based on the original recommendation of the Committee of Experts on the Transport of Dangerous Goods that the Class 5 hazard should be represented by a special symbol (flame above a circle) on a yellow background.

Thus, the colour of the background of the symbol of danger should be retained for each of the two labels of Class 5. Hence, the change of the yellow colour to the red one should be effected not in the upper part, but in the lower part of the label as shown below.

In addition, the expert from the Russian Federation notes that, except for labels for Class 5 where the division number is indicated in the bottom corner, the figure in the bottom corner of labels for other classes is normally the class number (i.e. 1, 2, 3, 4, 6, 7, 8 or 9) and not the division number. Therefore, the expert from the Russian Federation considers that, if labels for divisions 5.1 and 5.2 were differentiated by other means that the figure in the bottom corner, these two labels should only bear the class number in the bottom corner, i.e. "5" instead of "5.1" and "5.2". The proposed labels for divisions 5.1 and 5.2 are reproduced below:



Division 5.1



Division 5.2

3. Consequential amendments

In 5.2.2.2.2, under Class 5:

(a) Substitute label No. 5.1 with the new label proposed in this document; and change the text under label No. 5.1 to read:

"Symbol (flame over circle): black; Background: yellow; Figure "5" in the bottom corner".

(b) Substitute label No. 5.2 with the new label proposed in this document; and change the text under label No. 5.2 to read:

"Symbol (flame over circle): black; Background: upper half yellow; lower half red; Figure "5" in the bottom corner".