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**COMMITTEE OF EXPERTS ON THE  
TRANSPORT OF DANGEROUS GOODS**

**(Twentieth session,  
Geneva, 7-16 December 1998,  
agenda item 2 (c) and 3 (a) (iv))**

**WORK OF THE SUB-COMMITTEE OF EXPERTS ON  
THE TRANSPORT OF DANGEROUS GOODS**

**Draft amendments to the Model Regulations  
on the Transport of Dangerous Goods**

**Comment on ST/SG/AC.10/1998/34  
Subsidiary Risk Labels**

**Transmitted by the International Technical Committee for the  
Prevention and Extinction of Fire (CTIF)**

1. CTIF is very much in favour of the proposal to eliminate the obligation to use different labels for primary and subsidiary risks (ST/SG/AC.10/C.3/1998/5).
2. Because the primary purpose of a risk label is to assist the emergency responders and not to confuse them these risk labels should be kept as simple as possible. This can be achieved if only the shape, the colour(s) and the symbol(s) used for these labels communicate the hazard exactly and do not require any additional knowledge of transport of dangerous goods regulations.

3. The responder is more interested to know the hazard which a released chemical may present to the public and/or the environment than to know under which class or division this product can be retrieved from international regulations. Generally speaking only a few responders are very familiar with the Dangerous Goods List. To fulfil their task to act effective and safe they need not know that, for example, currently the subsidiary risk label No. 01 is used only for Division 1.2, that the subsidiary risk label No. 03 is used for either Division 2.1 or Class 3, or that the subsidiary risk label No. 06.1 which one would expect could represent either Division 2.3 or Division 6.1 is used only for Division 6.1.
  4. Although RID and ADR no longer maintain the distinction between primary and subsidiary risk labels, in their system some risk labels have a number in the bottom corner and some do not. This is necessary because some of the UN labels without that number are not specific enough to assign them to a Class or Division.if no additional text is displayed.
  5. CTIF is currently discussing in its Hazardous Materials Committee how risk labels could be further developed.
  6. CTIF would very much appreciate if the Sub-Committee would accept a short presentation of some of these ideas during the next meeting in December 1998. Because colour is essential for risk labels we would prefer to start a discussion on these ideas rather than to forward a proposal in black and white which could be more confusing than clarifying the ideas.
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