

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
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MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Comments on ST/SG/AC.10/C.3/2003/49 (United States of America)

Transport of dangerous goods documentation requirements
Reconsideration of technical name requirement for certain entries in the Dangerous Goods List

Transmitted by the European Council of Paint, Printing Ink and Artists Colours Industry (CEPE)

1. INTRODUCTION AND BACKGROUND

CEPE notes the proposals by the expert from the United States of America to remove the requirements of Special Provision 274 from the entries listed in Tables 1 and 2 of his paper. CEPE supports this approach and requests that consideration is given to adding two further entries to his Table 2.

2. BACKGROUND

Special Provision 274 applies to most but by no means all Not Otherwise Specified (N.O.S.) entries in the Dangerous Goods List and requires that up to two technical names are added in brackets after the Proper Shipping Name (ref. 3.1.2.8).

On the other hand, for many years it has been recognised within the UN and the modal regulations that it is appropriate to have specific UN numbers for certain types of products rather than utilise the various N.O.S. entries. Examples include UN 1133 Adhesives, UN 1210 Printing Ink, UN 1210 Printing Ink Related Material, UN 1263 Paint, UN 1263 Paint Related Material, UN 1306 Wood Preservatives, UN 1866 Resin Solution and UN 3066 Paint.

This arrangement is very helpful to industries where the detailed formulation of individual products within a range can be different but the general characteristics are the same and removes the need to mark packaging and documentation with technical names in brackets after the Proper Shipping Name. Such names could vary as a result of small percentage variations depending, for example, on different colours within a similar range of paints or inks.

This practice has withstood the test of time. Emergency services and others recognise the characteristics of such products and know how to deal with them should difficulties arise.

3. ENVIRONMENTALLY HAZARDOUS MATERIALS

The recent and on-going changes in classification relating to environmentally hazardous substances has, quite rightly, extended the number of products of these types coming into the scope of the transport of dangerous goods regulations. These include oil- or solvent-borne materials with flashpoints above 61°C and the ever increasing ranges of water-borne adhesives, paints, inks, wood preservatives and the resins used in their manufacture, as well as detergents and other cleaning materials, which now have to be classified in Class 9.

Currently the only option for manufacturers is to use UN 3077 or UN 3082 Environmentally Hazardous Substance, Solid or Liquid, N.O.S. followed by the technical names in brackets. This is generating exactly the same range of problems that originally led to the adoption of UN 1133, UN 1210 and so on. It has been suggested that these difficulties could be overcome by allocating additional specific UN numbers for Class 9 adhesives, paints, inks, detergents etc. However, a simpler solution, without creating a large range of new numbers, would be to simply remove SP274 from UN 3077 and UN 3082.

The emergency services are already fully aware that if a spillage of UN 3077 or UN 3082 occurs they should simply take steps to prevent the material from entering water courses, drains, streams or rivers. The technical names will not change the course of action that is taken. Where special segregation or stowage requirements apply (e.g. on board ship) they are applicable to all environmentally hazardous materials (marine pollutants) and again the technical names add little or nothing to the decisions taken. For these reasons we do not believe that the comments made by CTIF in their INF paper UN/SCETDG/24/INF.5 are applicable.

4. PROPOSAL

The proposal is to add UN 3077 and UN 3082 to the list of UN numbers given in Table 2 of the USA's document ST/SG/AC.10/C.3/2003/49 and thereby delete Special Provision 274 from these Class 9 entries in the Dangerous Goods List.

5. ALTERNATIVE PROPOSAL

If the Sub-Committee believes that total removal of SP274 from these entries is a step too far, an alternative proposal is presented for consideration. This proposal would be to replace Special Provision 274 for the Class 9 entries UN 3077 and UN 3082 in the Dangerous Goods List and the others in Tables 1 and 2 of 2003/49 by a new Special Provision XXX, enabling the use of appropriate technical or generic names in brackets after the Proper Shipping Name, where these do not already appear as part of the P.S.N.

SP XXX	For the purposes of documentation and package marking, the proper shipping name shall be supplemented with the technical name or an appropriate generic name (see 3.1.2.8). Where such a generic or technical name already forms part of the description this need not be repeated.
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A consequential amendment will also be necessary to 3.1.2.8.1.3, adding at the end:

“In the case of entries to which Special Provision XXX has been allocated in the Dangerous Goods List (e.g. UN3077 and UN3082), an appropriate generic name (e.g. paint, ink, adhesive, detergent) may be used as an alternative to the technical name(s). Where such a generic or technical name already forms part of the description (e.g. Alcohols, N.O.S.) it need not be repeated.”

6. JUSTIFICATION

Deleting SP274 from the listed entries will simplify for industry and consignors the work associated with the transport of such materials, building on the good experience over many years of transporting similar products classified in Classes 3 or 8, whilst not prejudicing safety or the work of the emergency responders.
