

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

17 November 2010

Thirty-eighth session

Geneva, 29 November – 7 December 2010

Item 4 of the provisional agenda

Listing, Classification and Packing

New UN entries for environmentally hazardous paints and printing inks

Transmitted by the International Paint and Printing Ink Council (IPPIC)

Introduction

1. Over the years as e.g. the use of flammable solvents decreases, more and more products in the paint and printing ink industry are classified in Class 9 with an environmental hazard as their only significant risk.
2. Currently the only option for UN numbers is to use UN 3077 or UN 3082, “Environmentally hazardous substance, solid or liquid, N.O.S.” followed by the technical names in brackets.
3. The problem for our industry is that the proper shipping names for these entries, which are required to be marked on packages and included in the transport document, are quite lengthy and complex (including technical names).

Proposal

4. It has been suggested that these difficulties could be overcome by allocating additional specific UN numbers for Class 9 paints and printing inks, as we have currently for products in Classes 3 and 8.
5. Other industries with generic entries may be similarly affected and could also benefit from such an approach. We are also open to any other suggestion to shorten the proper shipping name.
6. We should therefore welcome inclusion of this topic in the work programme for the biennium 2011-2012.

Justification

7. A new UN number for each of PAINT and PRINTING INK in Class 9 would simplify for industry and consignors the work associated with the transport of such materials, building on the good experience amassed over many years of transporting similar products classified in Class 9, whilst not prejudicing safety or the work of emergency responders.

Example

8. In place of the current

UN 3082 ENVIRONMENTALLY HAZARDOUS LIQUID N.O.S., (solvent naphtha (petroleum), light aromatic, epoxy resin (Mw ≤ 700)), 9, III

A new UN number would result in a much shorter sequence of dangerous goods on the transport document:

UN XXXX PAINT, 9, III

9. There are nonetheless special requirements in RID/ADR and the IMDG code to supplement the proper shipping name:

- In RID/ADR also the words ENVIRONMENTALLY HAZARDOUS are to be added on the document.
- According to the IMDG code the words MARINE POLLUTANT, plus the technical names causing this designation, are to be added on the document.

This would lead to:

RID/ADR: UN XXXX PAINT, 9, III, ENVIRONMENTALLY HAZARDOUS

IMDG Code: *UN XXXX PAINT (solvent naphtha (petroleum), light aromatic, epoxy resin ($M_w \leq 700$)), 9, III, MARINE POLLUTANT*
