

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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Listing, Classification and Packing

Comments on ST/SG/AC.10/C.3/2011/10 – Amendments to the Proper Shipping Name of Paint UN 1263

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

1. IPPIC appreciates the opportunity to comment on ST/SG/AC.10/C.3/2011/10, the paper by the expert from the Republic of Korea, concerning the proper shipping name of paint – UN 1263.
2. In the dangerous goods list in Chapter 3.2 of the Model Regulations on the Transport of Dangerous Goods, “Paint” and “Paint Related Material” are both assigned to UN 1263. Paint is clearly defined as paint, lacquer, enamel, stain, shellac, varnish, polish, liquid filler and liquid lacquer base while Paint Related Material is defined as paint thinning compound or reducing compound. Therefore, shipping both Paint and thinning compound in the same packaging does require use of both proper shipping names on the package and the shipping documents. While this is burdensome, it is necessary (and required under 2.0.2.2) in order to ensure that accurate information about the hazardous material is passed along in the case of an incident.
3. The proposal to eliminate “Paint” as a proper shipping name is extremely problematic for the following reasons:
 - (a) The proposed change does not enhance safety and emergency response actions as Paint Related Material does not accurately describe most of the UN 1263 in transport;
 - (b) The proper shipping name of Paint and Paint Related Material also appear in UN 3066, UN 3469 and UN 3470 and are defined in exactly the same manner as UN 1263;
 - (c) Paint is a very high volume commodity that is shipped worldwide. Indeed, 90% of UN 1263 in transport is Paint (and not Paint Related Material) and disappearance of Paint as a proper shipping name will cause significant confusion for manufacturers, shippers, carriers, emergency responders, and users of the material; and
 - (d) The time and resources necessary to make the change in information technology systems is significant and the increased costs are not warranted as carriers have not expressed any frustration or problems with the current system.
4. We note also that UN 1210 Printing Ink is structured similarly to UN 1263 in that it contains two proper shipping names: Printing Ink and Printing Ink Related Material.
5. In order to relieve the burden of marking a package containing Paint and Paint Related Material with both proper shipping names and the shipping documents similarly, IPPIC would like to suggest an alternative solution of creating a Special Provision that would allow for the option to use only “Paint Related Material” when a package contains

both Paint and Paint Related Material. This option could be afforded to UN 1263, UN 3066, UN 3469 and UN 3470, and the equivalent to UN 1210.

6. The proposed Special Provision would appear as:

SP-NNN A package containing both Paint and Paint Related Material, or both Printing Ink and Printing Ink Related Material, may be marked "Paint Related Material" or "Printing Ink Related Material" respectively.
