

## **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 June 2011**

### **Thirty-ninth session**

Geneva, 20–24 June 2011

Item 5 (d) of the provisional agenda

**Miscellaneous proposals of amendments to the Model Regulations  
on the Transport of Dangerous Goods: miscellaneous**

## **Technical names for environmentally hazardous materials**

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

### **Introduction**

1. At the last meeting of the Sub-Committee of Experts, IPPIC presented for discussion informal paper INF9, setting out the problems being experienced in the paint and ink industries with the length and complexity of Technical Names required under SP274 for products which are aquatic pollutants.
2. In INF9 we suggested that one option might be to have new generic names and UN numbers for such products of Class 9. However, this did not receive a favourable response from the Sub-Committee and it was suggested that a better route might be to reduce the impact of SP274 for such products, particularly for the maritime mode, and that IPPIC should explore that option with IMO.
3. To that end, IPPIC have submitted a paper (see attached Appendix 1) to the September 2011 meeting of IMO DSC 16, proposing to remove the requirement for Technical Names from products packed in Limited Quantities [and/or those packed in accordance with Packing Provision PP1].

### **Action**

4. The Sub-Committee are requested at this time to note the action being taken by IPPIC with IMO. Depending upon the outcome of the discussions at IMO, IPPIC may submit further proposals to the UNSCETDG relating to multi-modal implementation.

SUB-COMMITTEE ON DANGEROUS  
GOODS, SOLID CARGOES AND  
CONTAINERS  
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Agenda item 3

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**AMENDMENTS TO THE IMDG CODE AND SUPPLEMENTS, INCLUDING  
HARMONIZATION OF THE IMDG CODE WITH THE UN RECOMMENDATIONS  
ON THE TRANSPORT OF DANGEROUS GOODS**

**Documentation of Technical Names for Marine Pollutants**

**Submitted by The International Paint & Printing Ink Council (IPPIC)**

**SUMMARY**

*Executive Summary:*

This document proposes revising the requirements to document Technical Names of Marine Pollutants in small pack sizes

*Strategic direction:*

*High-level action:*

*Planned output:*

*Action to be taken:* Paragraphs 10, 11 and 12

*Related documents:* UNSCOE Report ST/SG/AC.10/C.3/76

UNSCOE Information Paper UN/SCETDG/38/INF.9

**Background**

1. 3.1.2.8/9 and 5.4.1.4.3.1/5 of the IMDG Code and currently Regulations 3 and 4 of MARPOL require the Proper Shipping Name of Marine Pollutants to be supplemented on packages and in transport documents with the Technical Names of the polluting ingredient(s) in accordance with Special Provision 274.
2. Over the years as, for example, 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. 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). The technical names can be almost incomprehensible to general users and the emergency services. Changes in Technical Names can be caused by minor changes in formulation (e.g. differences in paint colour), which adds to the problems and complexity, but the nature of the hazard remains the same for marine pollutancy. The required emergency action is still the same.

4. It had been suggested that these difficulties could be overcome by allocating additional specific UN numbers for Class 9 paints and printing inks, as there are currently for products in Classes 3 and 8.
5. To that end an Informal Paper UN/SCETDG/38/INF.9 (see Appendix 1) was submitted to the December 2010 meeting of the UN Sub-Committee for discussion. That meeting concluded (see Appendix 2) that the introduction of such additional entries would be inappropriate as there could be a call for similar additional numbers for many other such generic entries. On the other hand there could be an opportunity to reduce the impact of the requirements under SP274.

## Discussion

6. Since the UN SCETDG meeting, IPPIC have been in discussion with some other trade associations and national authorities and have considered the types of products and packaging where the requirements are the most onerous. IPPIC have also given consideration to the likely needs of emergency responders during and after incidents and the impacts of spillages on the marine environment.
7. It is generally accepted by all modes that the spillage risk is significantly reduced when goods are packed in "Limited Quantities". There is a similar reduction in packaging specification requirements under PP1 for packs  $\leq 5L$  containing UN1133, UN1210, UN1263, UN1866 and paints, inks and adhesives of UN3082. Experience has shown that, where such small packs of mixtures containing only a percentage of pollutants have been lost overboard, dispersal of the contents is such that there is little impact on the marine environment and there are no measures that can sensibly be taken by the emergency services to mitigate even such small impacts.
8. We therefore believe that it would be reasonable and helpful for the requirement to add the Technical Names of pollutants to descriptions on packs and documents to be removed for materials when packed in Limited Quantities [and/or in accordance with PP1].
9. Our understanding from DSC 16/3 is that, from 1<sup>st</sup> January 2014, Regulations 3 and 4 of MARPOL will be amended such that the latest provisions of the IMDG Code relating to Marking, Labelling and Documentation will automatically apply. Therefore, if the proposals set out below are adopted by the Sub-Committee, no further action would be required to amend MARPOL.

## Proposal

10. Add an additional section to Part 3:  
  
3.1.2.9.3 The requirements of 3.1.2.9.1 do not apply to Marine Pollutants when packed in Limited Quantities in accordance with Chapter 3.4 [or in packs in accordance with Packing Provision PP1].  
  
Amend 5.4.1.4.3.5 to read:  
  
..."and for generic or "not otherwise specified" (N.O.S.) entries the Proper Shipping Name shall be supplemented with the recognized chemical name of the marine pollutant, except when the goods are packed in Limited Quantities in accordance with Chapter 3.4 [or in packs in accordance with Packing Provision PP1] (see 3.1.2.9);"

11. To confirm that no further action will be required to amend MARPOL to implement these changes.

12. **Action requested of the Sub-Committee**

The Sub-Committee is invited to take action as appropriate.

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