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**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****Forty-ninth session**

Geneva, 27 June – 6 July 2016

Item 3 of the provisional agenda

**Listing, classification and packing****Proper shipping names for mixtures and solutions****Transmitted by the expert from the United States of America<sup>1</sup>****Introduction**

1. The selection of an appropriate proper shipping name listed within the Dangerous Goods List is a fundamental aspect of the Model Regulations that has a significant impact on determining applicable transport conditions. Detailed provisions addressing selection of a proper shipping name for mixtures and solutions are included in Chapters 2.0 and 3.1. Specific provisions addressing mixtures or solutions composed of a single predominant substance identified by name in the Dangerous Goods List are provided (see for example 2.0.2.2, 2.0.2.5, and 3.1.3.2).

2. Sections 2.0.2.5 and 3.1.3.2 address cases where a mixture or solution contains a single predominant substance, but where a proper shipping name other than the name for the predominant substance may be most appropriate. These conditions include:

- (a) *The mixture or solution is identified by name in the Dangerous Goods List;*
- (b) *The name and description of the substance named in the Dangerous Goods List specifically indicate that they apply only to the pure substance;*
- (c) *The hazard class or division, subsidiary risk(s), packing group, or physical state of the mixture or solution is different from that of the substance named in the Dangerous Goods List; or*

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2015–2016 approved by the Committee at its seventh session (see ST/SG/AC.10/C.3/92, paragraph 95 and ST/SG/AC.10/42, para. 15).

(d) *The hazard characteristics and properties of the mixture or solution necessitate emergency response measures that are different from those required for the substance identified by name in the Dangerous Goods List.*

3. Recently, requests for interpretations by consignors posed to different competent authorities have elicited different responses, underscoring the potential need for a clarification. Specifically, consignors have received conflicting interpretations as to the applicability of 2.0.2.5(a)/3.1.3.2(a) to mixtures that based on their intended use and application could be appropriately described by proper shipping names such as “resin solutions” or “paint”. Such mixtures or solutions often contain only one dangerous substance.

4. For example some authorities have indicated that a resin solution composed of a single dangerous substance such as butyl acetate and a mixture of other non-dangerous substances not may be appropriately described as “resin solution, UN1866”. However other competent authorities have considered that the most appropriate proper shipping name for such a solution is “butyl acetates solution, UN1123”.

5. In the opinion of this delegation, the current Model Regulations provide for the use of a proper shipping name such as “resin solutions” or “paint” even when the material in question contains only one predominant dangerous good. This is considered to be the intent of the existing provisions in 2.0.2.5(a) and 3.1.3.2(a). Given the varying interpretations of the current text however, the Sub-Committee is invited to consider whether a clarification to the existing text of 2.0.2.5 and 3.1.3.2 would be beneficial.

## **Proposal**

Amend 2.0.2.5(a) and 3.1.3.2(a) as follows:

(a) *The mixture or solution is identified by name (to include common names such as “Resin Solution”, “Extracts, flavouring”, or “Compound, cleaning liquid” etc.) in the Dangerous Goods List;*

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