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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**  
(Twentieth session, 3-12 December 2001,  
agenda item 5 (b))

**PACKAGINGS**

**Miscellaneous proposals**

**Chapter 4.1 - Use of packagings**  
**Proposal to amend special packing provision PP1**

**Transmitted by the European Confederation of Paint, Printing Ink and Artists Colours  
Manufacturers Association (CEPE)**

**Background**

1. In the late 1980's it was recognised and agreed by the Committee of Experts that the risks associated with the transport of inks, paints, adhesives and resins in small packs on pallets was less than for other flammable liquids. Special Provision 187 was agreed and adopted at that time after various pallet drop and other tests had been successfully carried out. SP187 allowed for the transport of UN 1133, UN 1210, UN 1263 and UN 1866 of Packing Groups II and III in packages of up to and including 5L, not required to meet the performance tests, either in combination packs up to 40Kg or on shrink- or stretch-wrapped pallets.
2. The concept was to consider the packaging, either in combination packs or on pallets, as "large" Limited Quantities packages. As the individual inners of LQ packs did not require labelling and marking, it was presumed that the same would apply to SP187 packages, only the outer carton or pallet being labelled. This logic was confirmed when the principles of SP187 were adopted into IMDG Amdt.26 in §3.2.6 of the section relating to Class 3. The requirement for labelling and marking was specifically excluded by not requiring adherence to §10.18.3 of the General Introduction dealing with the labelling and marking of inners in Unit Loads.

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3. When the layout of the UN Recommendations was changed for the 11<sup>th</sup> Edition, SP187 was subsumed into the new Special Packing Provision PP1 of Packing Instruction P001. This provision was adopted into the IMDG Code Amdt 30 as part of the modal harmonisation process. However, it became clear at the time of implementation that the exemption from labelling and marking of inners had been lost in the change from “§3.2.6” to “PP1”. Inners now have to be labelled and marked under the provisions of §5.1.2.2 dealing with overpacks.

### **Concerns of Industry**

4. This requirement is of significant concern to the paint, ink and adhesive industries as it leads to the need for large diamond labels to be affixed to containers, sold particularly in the retail market, if PP1 is utilised. However, if such products are transported in Limited Quantity cartons, no such marking and labelling is needed.

5. Experience of using Unit Loads under the provisions of SP187 and IMDG §3.2.6 have demonstrated that there has been no impact on safety by not having the inners labelled and marked, only the outers.

6. In order to overcome the requirement to label and mark individual containers, it is possible for industry to utilise the Limited Quantities provisions. However, this adds the significant costs of the process of packing containers in cartons but, more importantly, has a detrimental impact on the environment because of the additional packing materials that have to be used, when compared with simple shrink- or stretch-wrapped pallets of individual containers.

7. For all the reasons stated, CEPE considers that it is appropriate for PP1 to be amended to delete the requirement for marking and labelling of individual containers.

### **Proposal**

8. Amend PP1 by adding between “...performance tests in Chapter 6.1” and “when transported:” the following:

**“and the marking and labelling requirements of Chapter 5.2”.**

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