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(Bern, 24-28 March 2003)

Chapter 3.4 – Limited Quantities

Transmitted by the European Council of Paint, Printing Ink  
and Artists Colours Industry (CEPE) and the International Association of the Soap,  
Detergent and Maintenance Products Industry (AISE) \*/

Proposal to amend the package sizes for UN3082

<b>Analytical Summary:</b>	This proposal aims to amend the pack size allocated to UN3082 to 5L and thereby harmonize it with the UN Model Regulations and the IMDG Code, save on packaging waste and remove problems in intermodal transport.
<b>Action to be taken:</b>	Amend the allocated LQ code for UN3082 from LQ28 to LQ7

**1. Introduction**

When RID, ADR and the IMDG Code were restructured, the pack sizes for Limited Quantities were generally left unchanged. This meant that a number of anomalies remained between RID/ADR and the IMDG Code. Some of these have since been amended – for example the IMDG pack size for UN1210 Printing Ink and UN1263 Paint of Packing Group II, amongst others, has been increased to 5L, aligning with RID/ADR.

\*/ Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT/III/2003/10.

Recent changes to environmental classifications, resulting from amendments to the EU Preparations Directive, have meant that a number of previously non-hazardous printing inks have been reclassified as liquids hazardous to the environment, Class 9 UN3082.

This has highlighted another anomaly between IMDG and RID/ADR. Traditionally, such products have been packed in lever-lid containers in a similar fashion to flammable inks, Class 3, UN1210, PG III, the latter being packed under Limited Quantities provisions in 5L containers. Despite the reclassification into Class 9, this has not given rise to a problem for transport of these non-flammable inks by sea, as the pack sizes are the same. However, it has led to major difficulties for land transport as pack sizes have had to be reduced to 3L, somewhat ironically adding to packaging waste when the reclassification has been to protect the environment. There is no evidence that the environmental risk is any higher for UN3082 liquids in Limited Quantities than for those for similar products in Class 3 and yet the pack size is more restrictive. It is suggested, therefore, that increasing the pack size to 5L would not be detrimental to environmental safety, but would save on packaging waste and facilitate intermodal transport.

## **2. Proposal**

Amend the LQ Code for UN3082 from LQ28 to LQ7.

## **3. Justification**

Harmonization between RID/ADR and the IMDG Code without detriment to environmental safety and a saving on packaging waste.

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