

**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.3/2005/56 (United Kingdom)

Class 3 Flammable liquids Classification criteria

Transmitted by the European Council of Paint, Printing Ink and Artists' Colours Industry (CEPE)

CEPE has noted with interest the content of the document ST/SG/AC.10/C.3/2005/56 submitted by the United Kingdom.

Within the paint and printing industry a considerable number of companies are producing and transporting large volumes of viscous flammable liquids.

These substances are classified as Class 3 flammable liquids: they are liquids according to the definition of 1.2.1, they have a vapour pressure of max 300 kPa and a flashpoint not more than 60 °C.

But, within the classification of Class 3, they meet the criteria of the present 2.3.2.5 (viscous, flashpoint between 23 C and 60 °C, non toxic, non corrosive, max. 450 l per packaging).

So, although classified as Class 3, these products are exempted from various requirements (per mode of transport this exemption has different requirements like for example the use of UN certified packaging, marking, labelling, declaration, etc.).

The United Kingdom proposal adds the element “environmentally hazardous” for this type of Class 3 product. Although this aspect has not been addressed before, CEPE agree that it would be logical to amend 2.3.2.5 with this. Acceptance of the proposal will avoid the misunderstanding that these types of products should be classified as Class 9 products, UN 3082. This is not the case as hazardous products, classified into Class 1 to 8, with or without being environmentally hazardous, should be classified as a hazardous product of Class 1 to 8. Only products not already in classes 1 to 8, which are environmentally hazardous, should be classified into Class 9, under entry UN 3082.

It will further avoid strange situations, like that of a viscous liquid with a flashpoint of 60°C and which is environmentally hazardous is exempted from various requirements, while the same type of product with a flashpoint of 62 °C must meet all the requirements of Class 9.

The impact for the paint and printing industry will be quite high. The consequences are that viscous flammable environmentally hazardous products are not exempted anymore with the United Kingdom proposal. These products will be classified as Class 3 and therefore are dangerous goods which will increase the costs for packaging, marking, labelling, transport and storage.

Although, CEPE do believe this proposal is a contribution to further harmonization between the modes that will facilitate multimodal transport.
