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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

Twenty-ninth session
Geneva, 3-12 (a.m.) July 2006
Item 6 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Chapter 4.1 – Use of packagings

Proposal to amend Special Packing Provision PP1

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

Introduction

1. Currently substances of Class 3 with UN 1133 (adhesives), UN 1210 (printing inks and printing ink related materials), UN 1263 (paints and paint related materials) and UN 1866 (resin solutions) are to be packed in accordance with Packing Instruction P001. When of packing groups II and III, under Special Packing Provision PP1, they can be transported in quantities of 5 litres or less per metal or plastics packaging that are not required to meet performance tests of Chapter 6.1, provided that they are placed on a shrink- or stretch-wrapped pallet or in a combination packaging with a maximum net mass of 40 kg.
2. This enables the use of non-UN tested packaging that is consumer friendly and practically usable. This provision (and its predecessor SP187) has been safely used for well over a decade.

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3. The industry has reduced the use of solvents for good environmental reasons (VOC emissions, climate change).
4. Many of these flammable mixtures have been replaced by similar non-flammable, non-toxic, non-corrosive ones. However, not being classified in classes 1 to 8, some of them are assigned to UN 3082, environmentally hazardous substances, liquid, N.O.S., when fulfilling the classification rules of 2.9.3.4 for mixtures.
5. For similar reasons of practical use by the consumer, the use of packagings that are not required to meet the performance requirements is necessary.
6. All UN 3082 substances are allocated to Packing Group III only, showing that they are the least hazardous substances.
7. Mixtures of such similar substances assigned to UN 3082 packed in quantities of 5 litres or less per metal or plastics packaging do not represent a higher risk during transport than the equivalents of Class 3. In the present situation the packaging requirement for UN 3082 are more demanding than for similar mixtures of class 3. Therefore, mixtures of such similar substances assigned to UN 3082 should be covered by special packing provision PP1.

Proposals

8. It is proposed to amend special provision PP1 by including “UN 3082” as follows:

PP1 For UN 1133, UN 1210, UN 1263, ~~and~~ UN 1866 and UN 3082, packagings for substances of packing groups II ~~and or~~ III ~~and UN 3082 packagings~~ in quantities of 5 litres or less per metal or plastics packaging are not required to meet the performance tests in Chapter 6.1 when transported:

- (a) in palletized loads, a pallet box or unit load device, e.g. individual packagings placed or stacked and secured by strapping, shrink or stretch-wrapping or other suitable means to a pallet. For sea transport, the palletized loads, pallet boxes or unit load devices shall be firmly packed and secured in closed cargo transport units;
- (b) as an inner packaging of a combination packaging with a maximum net mass of 40 kg.

9. It is proposed to add ‘PP1’ in column 9 of the Dangerous Goods List for UN 3082.
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