



Secretariat

Distr.  
GENERAL

ST/SG/AC.10/C.3/2006/79  
8 September 2006

Original: ENGLISH

---

**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

Thirtieth session  
Geneva, 4-12 (a.m.) December 2006  
Item 2(a) of the provisional agenda

**PROPOSALS OF AMENDMENTS TO THE RECOMMENDATIONS  
ON THE TRANSPORT OF DANGEROUS GOODS**

Chapter 4.1 – Use of packagings

Modification of the proposal ST/SG/AC.10/C.3/2006/42  
to extend applicability of PP1 to some UN 3082 substances

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

1. The changes of formulations manufactured by the paint and printing ink industry, which led to the submission of the proposal ST.SG.AC.10/C.3/2006/42, are of net benefit to the environment. The industry has reduced the use of solvents with beneficial impacts in terms of VOC emissions and climate change. Many of these flammable mixtures have been replaced by similar non-flammable, non-toxic, non-corrosive ones. However, although no longer 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.
2. Currently Special Packing Provision PP1 enables flammable paints, inks, adhesives and resin solutions to be transported as palletized loads in non-UN tested packaging. Such a packaging system is widely used and PP1 has been safely practiced for well over a

GE.06-

decade. The formulation changes are now precluding the use of PP1 for such environmentally beneficial products. The only current option is to use Limited Quantities packaging, but this creates additional waste packaging material. Packaging in accordance with PP1 would maintain the full environmental benefit from the formulation changes.

3. At the twenty-ninth session of the Sub-Committee, it was found that the proposal ST/SG/AC.10/C.3/2006/42 to extend the special packing provision PP1 to adhesives, printing inks, paints and resin solutions would have opened it to more substances. It would have permitted all environmentally hazardous liquids, such as herbicides and pesticides to be transported in untested packaging.
4. Therefore, it is necessary to limit the allowance of the special packing provision PP1 to these specific mixtures under UN 3082. Some of the technical names describing these N.O.S. substances are not exclusively used for adhesives, printing inks, paints and resin solutions. It is therefore necessary to describe these substances by adding a description of the type of product, whenever PP1 is utilized.

## Proposals

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

**“PP1** For packagings adhesives, printing inks, printing ink related products, paints, paint related products and resin solutions which are assigned to UN 1133, UN 1210, UN 1263, UN 1866 or UN 3082, packing group II or III, packed in quantities of 5 litres or less per metal or plastics packaging, packagings 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; or
  - (b) as an inner packaging of a combination packaging with a maximum net mass of 40 kg.”
6. It is proposed to add ‘PP1’ in column 9 of the Dangerous Goods List for UN 3082.
-