

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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Item 6 (d) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: environmentally hazardous substances**

Packaging for environmentally hazardous paints, printing inks and adhesives

Transmitted by the International Paint & Printing Ink Council (IPPIC)

Introduction

1. IPPIC submitted proposals to the forty-first¹ and forty-second² sessions of the TDG Sub-Committee regarding packaging provisions for paints, inks, adhesives and resin solutions which, having previously been transported as unregulated products, are now increasingly being classified in Class 9 as a result of their environmental classification under GHS.

2. Following discussion in the Sub-Committee and with interested delegations, IPPIC is now proposing a slight modification to its approach for the 43rd session. Formal document ST/SG/AC.10/C.3/2013/29 (ST/SG/AC.10/C.3/2012/89)³ proposes new entries in the Dangerous Goods List for environmentally hazardous paints, inks, adhesives and resin solutions in Class 9; assuming that these new UN numbers would be created, this informal document proposes how they may be used to develop appropriate packaging provisions for such products, without causing complications or adverse effects for other provisions in the Model Regulations.

Discussion

3. Special Packing Provision PP1 to Packing Instruction P001 excepts packagings of paints, inks, adhesives and resin solutions of 5 litres or less from the performance tests in Chapter 6.1 because of the very low risk presented by these PG II and III materials. Paints, inks, adhesives and resin solutions that meet the Class 9 environmentally hazardous criteria (i.e. those identified in ST/SG/AC.10/C.3/2012/89 - ST/SG/AC.10/C.3/2013/29) present a lower safety risk in transportation than other PG III materials. Therefore it is logical to apply a packaging exception similar to PP1, but for larger packages, for these Class 9 materials.

¹ ST/SG/AC.10/C.3/2012/90

² UN/SCETDG/41/INF.31

³ Note by the secretariat: ST/SG/AC.10/C.3/2013/29 is identical to ST/SG/AC.10/C.3/2012/89 therefore it has not been processed by the Conference Management Division and will not be recorded as an official document.

4. Plastic pails in sizes of 5, 10, 20, 25 and 30 litres are typically used for these paints, inks, adhesives and resin solutions. The safety record of these packages in transportation is very good. Our experience over many years of transporting plastic and tinsplate pails and buckets in very high volumes indicates that, even in the case of the very few road accidents, there is no record of spilled product getting into rivers or streams as, by their very nature, paints, inks and adhesives are relatively easy to contain and recover.

5. DIY consumers, painting contractors and industrial customers require larger plastic and tinsplate pails/buckets because the user needs larger amounts for a particular task and does not want to dispose of multiples of smaller empty packs. UN versions of such pails, even where available (many plastic pails are only certified for solids), are difficult to remove the lid from and are expensive for basic consumer products. Please note that, previously, containers of such products now in Class 9 did not need to be regulated at all.

6. For these Class 9 materials, the safety risk presented in transportation is extremely low. As packaging requirements are directly tied to the level of risk presented in transportation, it does not make sense, from a safety perspective, to require UN specification packaging for these materials. The additional expense of UN specification packaging for very low hazard products far exceeds any safety benefits. IPPIC therefore proposes adoption of a special packing provision, with appropriate size limit, for Class 9 adhesives, printing ink and related materials, paint and related materials and resin solutions.

7. Prior to/in the absence of assignment of new UN numbers, the aforementioned Class 9 materials are classified as UN 3082 (or UN 3077), and as such Special Provision 375⁴ is now applied to these materials in the Model Regulations. It is therefore logical that SP 375 should also be applied to the new entries, to maintain the consistency and continuity of the provisions.

Proposals

8. The following proposals refer to the new UN numbers proposed in ST/SG/AC.10/C.3/2012/89 - ST/SG/AC.10/C.3/2013/29 and are predicated on the assumption that these have been adopted.

9. In 4.1.4.1, Packing Instruction P001, insert a new special packing provision as follows:

PPZZ For UN numbers 3XXX, 3YYY, 3AAA and 3BBB, metal or plastics packaging for substances in quantities of [20][25][30] litres or less per packaging are not required to meet the performance tests in Chapter 6.1 when transported:

(a) In palletised 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 palletised 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 40kg.

10. Amend special packing provision PP1 to Packing Instruction P001 to read as follows:

⁴ Adopted at the 42nd session of the TDG Sub-Committee and endorsed by the Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals at its sixth session in December 2012; see ST/SG/AC.10/40/Add.1.

PP1 For UN numbers 1133, 1210, 1263 and 1866 ~~and for adhesives, printing inks, printing ink related materials, paints, paint related materials and resin solutions which are assigned to UN3082~~, metal or plastics packaging for substances of packing groups II and III in quantities of 5 litres or less per packaging are not required to meet the performance tests in Chapter 6.1 when transported:

(a) In palletised 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 palletised 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 40kg.

11. In Chapter 3.2, Dangerous Goods List:

For UN Nos. 3XXX, 3YYY, 3AAA and 3BBB In column (6), insert “375”. In column (9), replace “PP1” by “PPZZ”.

Justification and consideration

12. As a general rule, packaging requirements directly correspond to the safety risk presented by a dangerous good in transportation. For these Class 9 materials, there is little or no safety risk presented. Consequently, IPPIC believes that a new higher packaging exception limit for adhesives, printing inks and related materials, paints and related materials and resin solutions which meet the Class 9 environmentally hazardous criteria (and are assigned one of the specific dedicated Dangerous Goods List entries) will not prejudice safety or the work of emergency responders.

13. IPPIC invites comments on these proposals from the experts of the TDG Sub-Committee. If the pre-requisite changes in ST/SG/AC.10/C.3/2012/89 (ST/SG/AC.10/C.3/2013/29) are adopted at the current session, IPPIC is prepared to submit a working document to the next session formally proposing the ideas in this informal document.
