

**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals**

29 November 2018

**Sub-Committee of Experts on the
Transport of Dangerous Goods**

Fifty-fourth session

Geneva, 26 November-4 December 2018

Item 2 (c) of the provisional agenda

**Recommendations made by the Sub-Committee on its
fifty-first, fifty-second and fifty-third sessions and
pending issues: listing, classification and packing**

**Technical names for environmentally hazardous goods of
Class 9 (UN 3077 and UN 3082)**

**Transmitted by the International Paint and Printing Ink Council
(IPPIC)**

Introduction

1. A lunchtime working group met on Wednesday 28 November to discuss the proposal by IPPIC in working document 2018/95 and to find an alternative approach to include provisions in the Model Regulations for technical names in the context of UN 3077 and UN 3082.
2. A preference was expressed for an approach which would apply generally and not require the creation of new special provisions or frequent amendments.
3. The group noted that UN 3077 and UN 3082 are frequently used for a (relatively small) number of commodity products which appear elsewhere in the Dangerous Goods List when classified under a hazard class other than Class 9 (e.g. Class 3 for paints, perfumery products etc.). In the latter case there is no requirement for a technical name, and safety is adequately assured by the generic name identifying the product together with the relevant transport conditions. This should be equally true for those commodities when classified as environmentally hazardous under Class 9.
4. Following a constructive discussion on how to identify generic names that are appropriate for use as technical names, and also how to exclude those that would be unsuitable, the working group concluded that this would be best addressed through an amendment to special provision 274, which is proposed below for the consideration of the Sub-Committee.
5. The proposed amendment has the additional advantage of assisting identification of recognised chemical (group) names in the Dangerous Goods List that may be used as technical names. In all cases the name which best describes the nature of the product is to be used, in accordance with the established principle of the Model Regulations (as in 2.0.2.8).

Proposal

6. Amend special provision 274 as follows (added text underlined):

“274 For the purposes of documentation and package marking, the proper shipping name shall be supplemented with the technical name (see 3.1.2.8).

For UN 3077 and UN 3082 only, the technical name may be a name shown in capital letters in column 2 of the Dangerous Goods List, provided that this name does not include “N.O.S.” and that special provision 274 is not assigned. The name which most appropriately describes the substance or mixture shall be used, e.g.:

UN 3082, ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S., (PAINT)

UN 3082, ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S., (PERFUMERY PRODUCTS)”
