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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-fifth session, 5-14 July 2004
Item 7 of the provisional agenda

**MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS
ON THE TRANSPORT OF DANGEROUS GOODS**

Environmentally hazardous solids and liquids

Transmitted by the European Council of Paint, Printing Ink and Artists Colours Industry (CEPE) and
the International Association of the Soap, Detergent and Maintenance Products Industry (AISE)

1. Introduction and background

Special Provision 274 applies to most but by no means all "Not Otherwise Specified" (N.O.S.) entries in the Dangerous Goods List and requires that up to two technical names are added in brackets after the Proper Shipping Name (ref. 3.1.2.8).

On the other hand, for many years it has been recognised within the UN and the modal regulations that it is appropriate to have specific UN numbers for certain types of products rather than utilise the various N.O.S. entries. Examples include UN 1133 Adhesives, UN 1210 Printing Ink, UN 1210 Printing Ink Related Material, UN 1263 Paint, UN 1263 Paint Related Material, UN 1266 Perfumery Products, UN 1306 Wood Preservatives, UN 1866 Resin Solution and UN 3066 Paint.

This arrangement is very helpful to industries where the detailed formulation of individual products within a range can be different but the general characteristics are the same and removes the need to mark packaging and documentation with technical names in brackets after the Proper Shipping Name. Such names could vary as a result of small percentage variations depending, for example, on different colours within a similar range of paints or inks.

This practice has withstood the test of time. Emergency services and others recognise the characteristics of such products and know how to deal with them should difficulties arise.

2. Environmentally hazardous materials

The recent and on-going changes in classification relating to environmentally hazardous substances has, quite rightly, extended the number of products of these types coming into the scope of the transport of dangerous goods regulations. These include oil- or solvent-borne materials with flashpoints above 61 °C and the ever increasing ranges of water-borne adhesives, paints, inks, wood preservatives and the resins used in their manufacture, as well as some cleaning materials, which now have to be classified in Class 9.

Currently the only option for manufacturers is to use UN 3077 or UN 3082 Environmentally hazardous substance, solid or liquid, N.O.S. followed by the technical names in brackets. This is generating exactly the same range of problems that originally led to the adoption of UN 1133, UN 1210 and so on. It has been suggested that these difficulties could be overcome by allocating additional specific UN numbers for Class 9 adhesives, paints, inks, etc. However, a simpler solution, without creating a large range of new numbers, would be to simplify the arrangements relating to SP274 for such materials.

The emergency services are already fully aware that if a spillage of UN 3077 or UN 3082 occurs they should simply take steps to prevent the material from entering water courses, drains, streams or rivers. Full technical names will not change the course of action that is taken. Where special segregation or stowage requirements apply (e.g. on board ship) they are applicable to all environmentally hazardous materials (marine pollutants) and again the full technical names add little or nothing to the decisions taken, unless the material is in such large quantities that special action might be called for. (It has been suggested that such a change will go against the principles of the MARPOL convention. However, we believe that this was originally intended to deal with pollutants in bulk and its application to goods in packages has occurred as a result of the general extension of regulation to packages, without specific regard to the unintended consequences).

3. Proposal

The proposal would be to replace Special Provision 274 for the Class 9 entries UN 3077 and UN 3082 in the Dangerous Goods List by a new Special Provision XXX, enabling the use of appropriate technical or generic names in brackets after the Proper Shipping Name.

"SP XXX For the purposes of documentation and package marking, the proper shipping name shall be supplemented with the technical name or an appropriate generic name (see 3.1.2.8)."

A consequential amendment will also be necessary to 3.1.2.8.1.3, adding at the end:

"In the case of entries to which Special Provision XXX has been allocated in the Dangerous Goods List (e.g. UN 3077 and UN 3082), an appropriate generic name (e.g. paint, ink, adhesive) may be used as an alternative to the technical name(s), where goods are transported in packages."

5. Justification

Replacing SP274 with SPXXX in the case of UN 3077 and UN 3082 will simplify for industry and consignors the work associated with the transport of such materials, building on the good experience over many years of transporting similar products classified in Classes 3 or 8, whilst not prejudicing safety or the work of the emergency responders.
