UN No. 3082, ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S.

Transmitted by the Government of Italy*. **

Introduction

1. Special provision 375, applicable to UN No. 3082, provides: “These substances when carried in single or combination packagings containing a net quantity per single or inner packaging of 5 l or less for liquids or having a net mass per single or inner packaging of 5 kg or less for solids, are not subject to any other provisions of RID provided the packagings meet the general provisions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8.”

2. However, special provision PP1 of packing instruction P001, provides:

PP1 For UN Nos. 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 UN 3082, metal or plastics packagings 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 carried:

3. In the view of Italy, taking into account that the same quantities are involved, there is a contradiction between these two provisions: special provision 375 is a total exemption from the other provisions of RID/ADR, whereas PP1 is an exemption only from the performance tests in Chapter 6.1.

4. It should be noted that the same provisions are contained in the UN Recommendations.

* In accordance with the programme of work of the Inland Transport Committee for 2018–2019 (ECE/TRANS/2018/21/Add.1 (9.2))

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Conclusion

5. If the Joint Meeting agrees with Italy, a proposal will be submitted to the Sub-Committee to delete the following phrase in special provision PP1 of packing instruction P001:

“and for adhesives, printing inks, printing ink related materials, paints, paint related materials and resin solutions which are assigned to UN 3082”.