

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Geneva, 21 September – 1 October 2021

9 September 2021

Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: new proposals

Supplementary information from the European Council for the Paint, Printing Ink and Artists' Colours Industry (CEPE) on document ECE TRANS/WP.15/AC.1/2021/37

1. Regulation (EC) No 1272/2008 on the classification, labelling and packaging of substances and mixtures (CLP Regulation), provides a period of eighteen months for companies to make labelling changes in response to a change in classification. Most recently the fifteenth ATP to the CLP Regulation has adopted changes in classification which will mean that products containing more or equal than 0.025 % of the preservatives 4,5-dichloro-2-octyl-2H-isothiazol-3-one (DCOIT), othilinone (OIT) and zinc pyrithione (ZnPT) will be classified as environmentally hazardous. These changes will apply from the **1st March 2022**. Consequently, products which are classified in accordance with section 2.2.9.1.10.5 of ADR, whereby substances and mixtures classified as environmentally hazardous under the CLP regulation will be classified as environmentally hazardous under ADR where no test data are available, will have to be transported as UN3082, PG III.

2. Different quantity sizes are used within the industry and in the supply chain, as the requirements from the consumer and professional users are different.

For the smaller pack size up to 5 L, there is no packaging problem because small quantities are not subject to the regulation by Special Provision 375 for UN3077/3082 and even if this special provision is not used, Limited Quantity still exists up to 5L.

An example of a typical plain plastic drum of 10 L used in the paint industry is:



In most cases the plastic drum is pre-printed with product, supply and use information.

UN approved plastic packaging are available for solids in drums, jerry cans or 200L drums, not for these 10-30L liquids used in the paint industry where production and tinting rely on these types of opening.

If larger quantities packaging becomes unavailable this would lead to more smaller quantities being used which is not sustainable. When reducing volume to 5 litres or below this will have big impact in the supply chain:

- Large quantities of these 5L or smaller packaging needed – supply issue
- Impact on production lines (package supplier as well as paint companies)
- Extra use of packaging material and labels
- More energy consumption and transport

- More time is required to tint the paint
 - More waste and a less sustainable solution
-