

**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 3 of the provisional agenda

Listing, classification and packing

**Transport provisions for small quantities of environmentally
hazardous paints, printing inks, and related materials –
Supplemental proposal**

Transmitted by the World Coatings Council (WCC)

I. Introduction

1. The World Coatings Council submits the following consolidated proposal after the discussion of document ST/SG/AC.10/C.3/2024/31. This informal document contains an amended proposal to resolve industry's packaging issue with Class 9 environmentally hazardous paint and printing ink.
2. The proposal contains a derogation for UN-approved packaging of mixtures classified as environmentally hazardous in plastic packaging > 5 and ≤ 30 L. The proposal accounts for substances that are already or will be classified as very toxic to the aquatic environment with an M-factor of 10, 100, or 1000. Very small concentrations will end up in environmentally hazardous classification (e.g. 0.025%).
3. The proposed derogation would apply to all mixtures that are environmentally hazardous by including criteria on the percentage of highly toxic ingredients by setting a maximum limit of 1% of substances with an M-factor = 10, 100, or 1000 in the mixture.

II. Proposal

4. In 4.1.4.1 add a new special packing provisions to packing instruction P001 for mixtures:

Mixtures assigned to UN 3082 and containing 1% or less of substances of highly toxic ingredients with an M-factor of 10, 100 or 1000 (as described in 2.9.3.4.6.4) when transported in plastic packagings containing a net quantity > 5 and ≤ 30 litres for liquids are not subject to the performance tests in Chapter 6.1 provided the packagings meet the general provisions of 4.1.1, except for 4.1.1.3, and 4.1.3.
