



**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****Forty-second session**

Geneva, 3 – 11 December 2012

Item 7 of the provisional agenda

**New proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods****Packaging for environmentally hazardous paints, printing
inks and adhesives****Transmitted by The International Paint & Printing Ink Council
(IPPIC)¹****Introduction**

1. The increase in the number of paint, printing inks, and adhesives coming into the scope of the transport of dangerous goods regulations because of classification as environmentally hazardous under GHS has created confusion for emergency responder, transport operators, regulators and industry personnel. Part of this confusion is due to the significant increase in the volume of Class 9 materials in the transportation chain.
2. Paint and printing ink are extremely high volume commodities in the global marketplace. Current data suggests that some 50% of the paint and printing ink shipped is water-borne, a high percentage of which is now regulated in Class 9. In the European Union alone, this is estimated to exceed some 5 million tonnes per annum.
3. These products include oil- or solvent-borne materials with flashpoints above 60 °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, all of which are now classified in Class 9. Examples of the additives which now cause the products to be EHS include zinc and the biocides to achieve product stability in warmer climates. These water-borne and high flash-point products have historically been transported as

¹ In accordance with the programme of work of the Sub-Committee for 2011-2012, approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38para. 16)

unregulated products, as they presented little or no safety risk, when compared with those of PG III for flammability or corrosivity.

4. Special Packing Provision PP1 excepts packagings of paints, inks, adhesives and resin solutions of 5 litres or less from Chapter 6.1 performance tests precisely because of the very low risk presented by these PG II and III materials. Paints, inks, adhesives and resin solutions that meet the Class 9 environmentally hazardous criteria present an even lesser safety risk in transportation than even the PG III flammable materials. Therefore, it is logical to extend the packaging exception of PP1 a bit further for these Class 9 materials.

5. Plastic pails in sizes of 5, 10, 20, 25 and 30 litres are typically used by DIY consumers, painting contractors and industrial customers and are transported in very high volumes. These products have been traditionally marketed in larger plastic or tinsplate pails/buckets, because the user needs larger amounts for a particular task and does not want to dispose of multiples of smaller empty packs. UN versions of such pails, even where available (many plastic pails are only certified for solids), are difficult for the consumer to remove the lid from and are expensive for what is a basic consumer product. Please note that, previously, containers of such products now in Class 9 did not need to be regulated at all.

6. The safety record of these containers in transportation is very good. Our experience over many years of transporting plastic and tinsplate pails and buckets indicates that, even in the case of the very road few accidents, there is no record of spilled product getting into rivers or streams as, by their very nature paints, inks and adhesives are relatively easy to contain and recover.

7. For these Class 9 materials, the safety risk presented in transportation is non-existent or extremely negligible. As packaging requirements are directly tied to the level of risk presented in transportation, it does not make sense, from a safety perspective, to require UN specification packaging for these materials. The additional expense of UN specification packaging for very low hazard products far exceeds any safety benefits. IPPIC therefore proposes that the size limit in the packing provision for class 9 adhesives, printing ink and related materials, paint and related materials and resin solutions be increased from 5 litres to [20][25][30] litres.

Proposal

8. Amend Special Packing Provision PP1 to Packing Instruction P001 to read as follows:

PP1 For UN numbers 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 UN3082~~, metal or plastics packaging for substances of packing groups II and III in quantities of 5 litres or less per packaging and metal or plastics packaging for adhesives, printing inks, printing ink related materials, paints, paint related materials and resin solutions which are assigned to UN3082 in quantities of [20][25][30] litres or less per packaging are not required to meet the performance tests in Chapter 6.1 when transported:

(a) In palletised loads, a pallet box or unit load device e.g. individual packagings placed or stacked and secured by strapping, shrink- or stretch-wrapping or other suitable means to a pallet. For sea transport, the palletised loads, pallet boxes or unit load devices shall be firmly packed and secured in closed cargo transport units; or

(b) As an inner packaging of a combination packaging with a maximum net mass of 40kg.

Justification

9. As a general rule, packaging requirements directly correspond to the safety risk presented by a dangerous good in transportation. For these Class 9 materials, there is little or no safety risk presented. Consequently, an increase in the packaging exception limit for adhesives, printing inks and related materials, paints and related materials and resin solutions which meet the Class 9 environmentally hazardous criteria will not prejudice safety or the work of emergency responders.
