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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****Forty-sixth session**

Geneva, 1 – 9 December 2014

Item 2 (b) of the provisional agenda

**Recommendations made by the Sub-Committee on its forty-third,  
forty-fourth and forty-fifth sessions and pending issues: listing, classification and packing****Classification of small quantities of environmentally  
hazardous substances that are also viscous flammable liquids****Transmitted by the International Paint and Printing Ink Council  
(IPPIC)<sup>1</sup>****Introduction and discussion**

1. At the forty-fifth session of the Sub-Committee IPPIC introduced informal document INF.24, seeking to resolve an anomaly which has arisen where two provisions allowing exemption from the Model Regulations overlap. A number of delegations supported the proposed solution, but there were also some comments regarding alignment with the existing provisions and about the clarity of the proposal. IPPIC was invited to submit a formal proposal taking account of the comments made.

2. In accordance with Special Provision 375, environmentally hazardous substances (classified under UN Nos. 3077 and 3082), when transported in single or combination packagings containing a net quantity per single or inner packaging of 5 litres or less for liquids or 5 kilograms or less for solids, are not subject to any other provisions of the Model Regulations provided the packagings meet general provisions of 4.1.1.1, 4.1.1.2 and 4.1.1.4 to 4.1.1.8.

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).



3. In accordance with the provisions of 2.3.2.5 in the Model Regulations, certain viscous flammable liquids which have a flashpoint of 23°C or above and less than or equal to 60°C, which are not also toxic, corrosive or environmentally hazardous, are not subject to the regulations if they meet the criteria listed in 2.3.2.5 and are packed in receptacles of less than 450 litres.
4. This leads to the anomaly whereby substances that are only viscous flammable liquids can be excepted from most requirements, and those that are only environmentally hazardous substances can also be excepted when packed in small quantities, but viscous flammable liquids that are also environmentally hazardous in small quantities must comply with the full requirements of the Model Regulations.
5. IPPIC proposes to resolve this inconsistency by amending the text of 2.3.2.5 to incorporate the conditions of Special Provision 375. As both relaxations have been accepted individually, no reduction in safety is anticipated as a result of this proposal.
6. The Sub-Committee is invited to consider the proposal below, to extend the scope of 2.3.5.2 by inclusion of substances which are also environmentally hazardous but only when the latter are packaged in quantities of 5 litres or less, in line with Special Provision 375.

## Proposal

7. Amend 2.3.2.5 to read as follows:

“**2.3.2.5 Viscous liquids**

2.3.2.5.1 Except as provided for in 2.3.2.5.2, ~~viscous~~ viscous liquids which:

- Have a flash point of 23°C or above and less than or equal to 60°C;
- Are not toxic, corrosive or environmentally hazardous;
- Contain not more than 20% nitrocellulose provided the nitrocellulose contains not more than 12.6% nitrogen by dry mass; and
- Are packed in receptacles of not more than 450 litre capacity;

Are not subject to these Regulations, if:

- (a) In the solvent separation test (see *Manual of Tests and Criteria*, Part III, sub-section 32.5.1), the height of the separated layer of solvent is less than 3% of the total height; and
- (b) The flowtime in the viscosity test (see *Manual of Tests and Criteria*, Part III, subsection 32.4.3), with a jet diameter of 6 mm is equal to or greater than:
  - (i) 60 seconds; or
  - (ii) 40 seconds if the viscous substance contains not more than 60% of Class 3 substances.

2.3.2.5.2 Viscous liquids which are also environmentally hazardous, but meet all other criteria in 2.3.2.5.1, are not subject to any other provisions of these Regulations when they are transported in single or combination packagings containing a net quantity per single or inner packaging of 5 litres or less, 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.”