
Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

23 November 2011

Sub-Committee of Experts on the Transport of Dangerous Goods

Fortieth session

Geneva, 28 November – 7 December 2011

Item 2 (c) of the provisional agenda

Listing, classification and packing: miscellaneous

Transport of uncleaned waste packaging having contained dangerous goods

Transmitted by the expert from the United Kingdom

Introduction and background

1. At the Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods held in Geneva from 13th to 23rd September 2011, the expert from France made certain proposals regarding the carriage of packaging wastes, empty, uncleaned consigned for the purpose of recycling the material from which the packaging was constructed or for disposal (see ECE/TRANS/WP.15/AC.1/124 paragraphs 74 and 75). Those discussions have yet to be completed but the view of the Joint Meeting was that a rapid solution to the perceived problem was needed as the disposal of such waste posed a regulatory problem at the EU level. However, the expert from the UK is of the view that this is an issue which will also be pertinent in other regions of the world and which may also involve journeys consisting of both land and sea transport legs (i.e. short sea ferry crossings). It would therefore be sensible, in the view of the expert from the United Kingdom, to consider this issue in the context of the UN Model Regulations.
2. The expert from the United Kingdom believes that much packaging waste, empty, uncleaned is consigned for purposes of re-use and as such is adequately covered now by the Model Regulations. The transport of empty packaging is addressed in 4.1.1.11 of the Model Regulations which states:

“4.1.1.11 Empty packagings, including IBCs and large packagings, that have contained a dangerous substance shall be treated in the same manner as is required by these Regulations for a filled packaging, unless adequate measures have been taken to nullify any hazard.”
3. The packaging only becomes ‘waste’ when the consignor either decides that is no longer viable for future use as it is no longer fit for purpose, or it is more economical to send it for recycling or, more likely, when the user of the product contained in the packaging has no interest in the future of the discarded packaging and simply wishes to rid themselves of it. In these circumstances the ‘waste’ packagings are often collected en masse and placed in a bin, box or bulk container for transport to a sorting, recycling or disposal point. In this case it is likely that the empty packagings come from a number of sources and have had a range of different classes of dangerous goods in them. In most cases, such

consignments will also include waste packagings that have not contained dangerous goods. The question arises about how such consignments should be transported and what marks, labels, documentation etc. are required.

4. It has been proposed that such consignments should be generically classified according to their hazard. Compatibility of substances of different classes may be considered an issue, but that is at least in part addressed by 4.1.1.6 of the Model Regulations. In practice there does not seem to be any history of incidents arising from incompatible substances reacting together in waste consignments. However, the expert from the United Kingdom believes that it would be unnecessarily confusing to mark and label packagings carrying mixed waste empty packaging with a range of class labels and multiple UN numbers for many different classes. It would seem to be impracticable for this to be achieved consistently, however diligent the consignor or carrier might be.

Proposal

5. The expert from the UK invites the members of the Sub-Committee to indicate whether they agree that the transport of packaging wastes, empty, un-cleaned is currently inadequately covered by the Model Regulations and if this is an issue for the Sub-Committee to resolve.

6. In anticipation that the Sub-Committee does decide that packaging wastes, empty, un-cleaned is not adequately covered in the Model Regulations the expert from the United Kingdom is prepared to bring a proposal to the next session of this Sub-Committee. Such a proposal could be in the form of a new UN number and Proper Shipping Name in the Dangerous Goods List complete with any associated new text (such as a packing instruction) unless the Sub-Committee determines a different approach. In the former case the following approach might be adopted:

7. Add a new UN number as follows:

UN No.	Name and description	Class or division	Subsidiary risk	UN packing group	Special provisions	Limited and excepted quantities		Packagings and IBCs		Portable tanks and bulk containers	
								Packing instruction	Special packing provisions	Instructions	Special provisions
(1)	(2)	(3)	(4)	(5)	(6)	(7a)	(7b)	(8)	(9)	(10)	(11)
-	3.1.2	2.0	2.0	2.0.1.3	3.3	3.4	3.5	4.1.4	4.1.4	4.2.5 / 4.3.2	4.2.5
3XX X	PACKAGING WASTES, EMPTY, UN-CLEANED FOR DISPOSAL	9			YYY	0	E0	P9XX		LP9XX	

SPYYYY

This entry applies to packaging wastes, empty, un-cleaned collected together into an outer packaging for purposes of recycling or disposal.

P9XX	PACKING INSTRUCTION	P9XX
This instruction applies to UN No. 3XXX		
Packaging wastes, empty, un-cleaned shall be placed in outer packagings. The packagings shall meet the provisions of 4.1.1.1 , 4.1.1.2 , 4.1.1.6 , 4.1.1.8 and 4.1.3 and be so designed that they meet the construction requirements of 6.1.4 . Outer packagings constructed of suitable material and of adequate strength and design in relation to the packaging capacity and its intended use shall be used.		
Additional requirement		
The empty uncleaned packagings shall only have contained substances of classes 3, 4.1, 5.1, 6.1, 8 or 9		

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Consequential amendments:

Add a note under 4.1.1.11

NOTE: For packaging wastes, empty, un-cleaned see UN3XXX.

A requirement or otherwise for transport documentation will also need to be considered.