



Secretariat

Distr.  
GENERAL

ST/SG/AC.10/C.3/2009/34  
3 September 2009

Original: ENGLISH

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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

Thirty-sixth session  
Geneva, 30 November– 9 December 2009  
Item 8 of the provisional agenda

**GLOBAL HARMONISATION OF TRANSPORT OF DANGEROUS GOODS  
REGULATIONS WITH THE MODEL REGULATIONS**

The position of the word WASTE on the transport document in the Model Regulations  
and RID/ADR/ADN

Transmitted by the expert from the United Kingdom<sup>1</sup>

**Introduction**

1. In discussions on the Intergovernmental Organization for International Carriage by Road (OTIF) secretariat's document OTIF/RID/CE/2007/5 at the 44<sup>th</sup> session of the RID Committee of Experts on the Transport of Dangerous Goods, it was pointed out that there are differences in the sequence of information on the transport document for the transport of wastes between RID/ADR/ADN 5.4.1.1.3 and the UN Model Regulations on the Transport of Dangerous Goods (and therefore the IMDG Code and ICAO Technical Instruction) 5.4.1.4.3(c) (5.4.1.4.3.3 in the IMDG Code) about which some delegations expressed concern regarding the consequences for multimodal operations.

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2009-2010 approved by the Committee at its fourth session (refer to ST/SG/AC.10/C.3/68, para. 118 (g) and ST/SG/AC.10/36, para. 14).

2. In RID/ADR/ADN the word “waste” is required before the UN number and the proper shipping name whereas in the Model Regulations/IMDG Code/ICAO Technical Instructions the word “waste” is required before the proper shipping name (i.e. after the UN number). The intention of both is to draw attention to the fact that wastes are being carried.

3. At the 35<sup>th</sup> session of the Sub-Committee, the United Kingdom submitted informal document INF.43 which set out the same proposal as presented here in paragraph 7 below i.e. the order should be as in RID/ADN/ADN. The secretariat during the debate noted that the order of words presented in the UN Model Regulations was the result of an oversight, and that the intention had been to position the word “waste” in the same manner as RID/ADR/ADN to highlight the fact that wastes are being transported. An amendment following the decision on the sequence of information to be the UN number followed by the proper shipping name was simply overlooked. The Sub-Committee requested that the United Kingdom’s proposal be resubmitted as a formal paper at the 36<sup>th</sup> session for decision.

4. As a consequence, a proposal to align RID/ADR/ADN with the UN Model Regulations at the Joint Meeting of September 2009 will be withdrawn pending the 36<sup>th</sup> session of the Sub-Committee, see ECE/TRANS/WP15/AC.1/2009/19. If the Sub-Committee endorses the wording put forward in this informal document to align it with RID/ADR/ADN then 2009/19 will not be tabled at the March 2010 Joint Meeting. If however the Sub-Committee endorses what is currently in the Model Regulations then the United Kingdom will resubmit 2009/19 to the Joint Meeting to realign the texts.

5. The expert from the United Kingdom is aware that the Sub-Committee will realise that the United Kingdom has submitted papers to two different fora advocating opposing solutions. However the main concern for the United Kingdom is modal harmonisation and the very fact that it has put in these differing papers shows the confusion that can arise. How much more difficult it must be for those involved in transporting these products having to deal with the cost implications of differing documentation.

6. With this in mind the expert from the United Kingdom proposes that it would be more appropriate to amend the Model Regulations such that the word “waste” precedes the UN number so as to draw attention to the fact that waste is being carried (i.e. to align the Model Regulations (and subsequently the IMDG Code and the ICAO Technical Instructions) to RID/ADR/ADN).

### **Proposal**

7. In 5.4.1.4.3 (c) of the Model Regulations, between “processing for disposal,” and “the proper shipping name” add “the UN number and” so to read as follows:

“(c) Wastes: For waste dangerous goods (other than radioactive wastes) which are being transported for disposal, or for processing for disposal, the UN number and the proper shipping name shall be preceded by the word “WASTE”, unless this is already a part of the proper shipping name;”

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