

**ECONOMIC COMMISSION FOR EUROPE**

**INLAND TRANSPORT COMMITTEE**

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods

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Item 7 (b) of the provisional agenda

**PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN**

Packing waste

Transmitted by the Government of Sweden

**SUMMARY**

**Executive summary:** Existing provisions can be used if modified

**Action to be taken:** Add additional text in 1.1.3.6 and 7.3.1.1.

**Related documents:** ECE/TRANS/WP.15/AC.1/2009/36.

**Introduction**

Sweden understands the intent with the proposal, but we think this issue should be solved in a different way instead of introducing a whole new exception.

Sweden believes it is difficult in practice to actually decide when packagings are empty, or if they still contain products and therefore should be transported in accordance with the simplified system in 2.1.3.5.5. We think the possibility to use an exemption from the regulations may be mis-used.

Furthermore, it may seem a bit odd that empty uncleaned packagings not suitable for use are totally exempted from the regulations, whereas empty uncleaned packagings that *are* suitable for use have to comply with the regulations and also have to be transported in accordance with 1.1.3.6.

Sweden supports the proposed definition in 2009/36, but we suggest that the existing provisions in 1.1.3.6 with some amendments should be used for the described packagings.

**Proposal 1**

Amend section 1.1.3.6.2 to read as follows (new text **bold and underlined**):

1.1.3.6.2 Where the quantity of dangerous goods carried on a transport unit does not exceed the values indicated in column (3) of the table in 1.1.3.6.3 for a given transport category (when the dangerous goods carried in the transport unit belong to the same category) or the value calculated in accordance with 1.1.3.6.4 (when the dangerous goods carried in the transport unit belong to different transport categories), they may be carried in packages in one transport unit without application of the following provisions:

- Chapter 1.10, except for Class 1 explosives of Division 1.4 of UN Nos. 0104, 0237, 0255, 0267, 0289, 0361, 0365, 0366, 0440, 0441, 0455, 0456 and 0500;
- **Chapter 4.1 for solid waste consisting of various uncleaned packagings (see definition in 1.2);**
- Chapter 5.3;
- Section 5.4.3;
- Chapter 7.2, except for V5 and V8 of 7.2.4;
- CV1 of 7.5.11;
- Part 8 except for 8.1.2.1 (a),  
8.1.4.2 to 8.1.4.5,  
8.2.3,  
8.3.3,  
8.3.4,  
8.3.5,  
Chapter 8.4,  
S1(3) and (6),  
S2(1),  
S4 and  
S14 to S21 of Chapter 8.5;
- Part 9.

Transport category  (1)	Substances or articles packing group or classification code/group or UN No.  (2)	Maximum total quantity per transport unit  (3)
0	Class 1: 1.1A/1.1L/1.2L/1.3L and UN No. 0190 Class 3: UN No. 3343 Class 4.2: Substances belonging to packing group I Class 4.3: UN Nos. 1183, 1242, 1295, 1340, 1390, 1403, 1928, 2813, 2965, 2968, 2988, 3129, 3130, 3131, 3134, 3148, 3396, 3398 and 3399 Class 5.1: UN No. 2426	0

	<p>Class 6.1: UN Nos. 1051, 1600, 1613, 1614, 2312, 3250 and 3294  Class 6.2: UN Nos. 2814 and 2900  Class 7: UN Nos. 2912 to 2919, 2977, 2978 and 3321 to 3333  Class 8: UN No. 2215 (MALEIC ANHYDRIDE, MOLTEN)  Class 9: UN Nos. 2315, 3151, 3152 and 3432 and apparatus containing such substances or mixtures and empty uncleaned packagings, <b>and solid waste consisting of various uncleaned packagings</b> except those classified under UN No. 2908, having contained substances classified in this transport category.</p>	
1	<p>Substances and articles belonging to packing group I and not classified in transport category 0  and substances and articles of the following classes:  Class 1: 1.1B to 1.1J<sup>a</sup>/1.2B to 1.2J/1.3C/1.3G/1.3H/1.3J/1.5D<sup>a</sup>  Class 2: groups T, TC<sup>a</sup>, TO, TF, TOC and TFC  aerosols: groups C, CO, FC, T, TF, TC, TO, TFC and TOC  Class 4.1: UN Nos. 3221 to 3224 and 3231 to 3240  Class 5.2: UN Nos. 3101 to 3104 and 3111 to 3120</p>	20
2	<p>Substances or articles belonging to packing group II and not classified in transport categories 0, 1 or 4  and substances of the following classes:  Class 1: 1.4B to 1.4G and 1.6N  Class 2: group F  aerosols: group F  Class 4.1: UN Nos. 3225 to 3230  Class 5.2: UN Nos. 3105 to 3110  Class 6.1: substances and articles belonging to packing group III  Class 9: UN No. 3245</p>	333
3	<p>Substances and articles belonging to packing group III and not classified in transport categories 0, 2 or 4  and substances and articles of the following classes:  Class 2: groups A and O  aerosols: groups A and O  Class 3: UN No. 3473  Class 4.3: UN No. 3476  Class 8: UN Nos. 2794, 2795, 2800, 3028 and 3477  Class 9: UN Nos. 2990 and 3072</p>	1 000
4	<p>Class 1: 1.4S  Class 4.1: UN Nos. 1331, 1345, 1944, 1945, 2254 and 2623  Class 4.2: UN Nos. 1361 and 1362 packing group III  Class 7: UN Nos. 2908 to 2911  Class 9: UN No. 3268  and empty, uncleaned packagings,  <u>and solid waste consisting of various uncleaned packagings having contained dangerous goods</u>, except for those classified in transport category 0</p>	unlimited

## Proposal 2

Amend section 7.3.1.1 to read as follows (new text **bold and underlined**):

7.3.1.1 Goods may not be carried in bulk in bulk containers, containers or vehicles unless:

- (a) either a special provision, identified by the code BK, explicitly authorizing this mode of carriage is indicated in column (10) of Table A of Chapter 3.2 and the relevant conditions of 7.3.2 are satisfied in addition to those of this section; or
- (b) a special provision, identified by the code VV, explicitly authorizing this mode of carriage is indicated in column (17) of Table A of Chapter 3.2 and the conditions of this special provision, as laid down in 7.3.3 are satisfied in addition to those of this section.

Nevertheless, empty packagings, uncleaned, **and solid waste consisting of various uncleaned packagings** may be carried in bulk if this mode of carriage is not explicitly prohibited by other provisions of ADR.

*NOTE: For carriage in tanks, see Chapters 4.2 and 4.3.*

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