
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

9 September 2011

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

Geneva, 13-23 September 2011

Item 6 (a) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: pending issues

Comments on ECE/TRANS/WP.15/AC.1/2011/49 Carriage of empty uncleaned packaging wastes

Transmitted by the Government of Sweden

Introduction

1. Sweden understands the intent with the proposal, and we also believe some provisions and exemptions for these types of uncleaned packaging wastes should be included. Concerning the two different alternatives in document 2011/49 from France, we favor the principle in the second alternative; proposal 2. We think it is more appropriate to include provisions for these types of waste in more general terms. However, as was expressed by some delegates at the last meeting, we think this issue could be solved by using already existing provisions, which could be slightly modified to fit the packaging waste.

2. Sweden submitted an informal paper, INF.28, to the September session 2009, where we proposed to use the existing sub-section 1.1.3.6 as a base, but with some minor amendments. However, we were not present at the working group dealing with this issue and this paper was never discussed. Nevertheless, instead of introducing an entirely new exemption in 1.1.3.5, we believe it would be preferable to use the existing 1.1.3.6 as a starting point. The provisions in sub-section 1.1.3.6 are well known and are already used for other empty uncleaned packagings. Therefore, it would be more user-friendly proceed in this direction.

3. Thus, we propose to include these types of packaging wastes in transport category 4 in 1.1.3.6.3 and to add a definition for empty uncleaned packaging wastes in section 1.2. As a consequential amendment, we also need to add a paragraph in chapter 5.4 stating provisions concerning requirements in the transport document. Lastly, subsection 7.3.1.1 should be amended to take into account that these types of packagings are allowed in bulk.

Proposal

In Table 1.1.3.6.3, amend the entry for Transport category 4 to read as follows (new text **bold**):

Transport category (1)	Substances or articles packing group or classification code/group or UN No. (2)	Maximum total quantity per transport unit (3)
4	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 having contained dangerous goods, except for those classified in transport category 0 Empty uncleaned packaging wastes: Packaging wastes having contained at least one substance of class 3, 4.1, 5.1, 6.1 or 8 belonging to packing Group II and packaging wastes having contained only substances of Class 9 belonging to packing Group III.	unlimited

Consequential amendment in chapter 1.2 (new text **bold**):

Empty uncleaned packaging wastes: means packagings, large packagings and intermediate bulk containers (IBCs) which are carried to be disposed of because they are broken (parts of packagings), damaged, not fit for use, or meant to be disposed of for any other reason, and which have contained solids or liquids of classes 3, 4.1, 5.1, 6.1, 8 or 9, and which have been emptied to such a point that accumulation of free liquid cannot occur inside the means of containment, but can present residues stuck to their internal or external walls.

Consequential amendment in 5.4.1.1.6.2.1 (new text **bold**):

For empty packagings, uncleaned, which contain the residue of dangerous goods of classes other than Class 7, including empty uncleaned receptacles for gases with a capacity of not more than 1 000 litres, the particulars according to 5.4.1.1.1 (a), (b), (c), (d), (e) and (f) are replaced with "EMPTY PACKAGING", "EMPTY RECEPTACLE", "EMPTY IBC" or "EMPTY LARGE PACKAGING", as appropriate, followed by the information of the goods last loaded, as described in 5.4.1.1.1 (c).

See example as follows: "EMPTY PACKAGING, 6.1 (3)".

For empty uncleaned packaging wastes the particulars according to 5.4.1.1.1 (a), (b), (c), (d), (e) and (f) are replaced with "EMPTY UNCLEANNED PACKAGING WASTE", "EMPTY UNCLEANNED IBC WASTE" or "EMPTY UNCLEANNED LARGE PACKAGING WASTE", as appropriate, followed by the information of the goods last loaded, as described in 5.4.1.1.1 (c).

See example as follows: "EMPTY UNCLEANNED PACKAGING WASTE, 6.1 (3)"

Consequential amendment in 7.3.1.1 (new text **bold**):

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 empty uncleaned packaging wastes** 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.