

## 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

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Item 3 (b) of the provisional agenda

**Listing, classification and packing: miscellaneous**

## Comments on UN/SCETDG/41/INF.19 (Transport of packaging waste with residues of dangerous goods)

Transmitted by the European Chemical Industry Council (CEFIC)

### Introduction

1. After having reviewed the report of the meeting of the Joint RID/ADR/ADN working group on the transport of packaging waste containing residues of dangerous goods, which has been submitted as informal document INF.19, CEFIC would like to make the following comments and proposals.

### Comments and proposals

#### On the new Special Provision yyy

2. The scope of the new entry in Class 9 should specifically cover the transport of empty uncleaned packagings that no longer comply with the UN Model Regulations. Empty uncleaned packagings that still comply with the regulations, and which may also be transported for disposal, recycling or recovery of their material, should not be subject to the new entry. CEFIC therefore proposes inserting the words “non-compliant uncleaned” in the first sentence of the new special provision:

“yyy This entry may only be used for non-compliant uncleaned packagings, large packagings or intermediate bulk containers (IBC), or parts thereof, which are ...”

3. The requirement to affix all the placards corresponding to the risks or subsidiary risks related to each residue on the outside of the cargo transport unit is not justified by the very small quantity of residues present and may even lead to inadequate measures in an emergency. CEFIC therefore support the deletion of this sentence as already referred to in the footnote “EXPLANATORY NOTE”.

4. A provision for the implementation of sorting procedures including keeping documentation for monitoring purposes is far beyond any requirements already implemented in dangerous goods regulations such as “Shipper’s declarations” and “CTU packing certificates”. Enforcement into compliant and responsible operations has to be regulated on national level, and has never been the scope of the UN Model Regulations. Therefore CEFIC proposes to delete this paragraph.

## On the new Special Packing Provisions

5. The use of flexible packaging should not be excluded as they can comply with the requirements proposed for rigid packaging and are permitted for solid dangerous goods. Therefore it is proposed to remove the word “rigid”.

6. As referred to in paragraph 7 of UN/SCETDG/41/INF.19, packagings should be exempted from testing and type approval, and this should be incorporated in the new Special Packing Provisions.

7. The need for a means of retaining should only be required when there is indeed a risk that any free liquid might escape, which definitely has not to be considered in case of solid residues.

8. In view of the 3 comments above, CEFIC proposes to amend the first sentence of the two proposed Special Packing Provisions as follows

“PPxx For UN 3xxx packaging meeting the construction requirements of 6.1.4, made leak tight or fitted with a leak tight and puncture resistant sealed liner or bag, shall be used. The packaging is not required to meet the testing requirements of 6.1.5. When there is a risk that free liquid residues might escape during the transport, the packaging has to provide a means of retaining, e.g. absorbent material.”

“Lxx For UN 3xxx large packaging meeting the construction requirements of 6.6.4, made leak tight or fitted with a leak tight and puncture resistant sealed liner or bag, shall be used. The large packaging is not required to meet the testing requirements of 6.6.5. When there is a risk that free liquid residues might escape during the transport, the packaging has to provide a means of retaining, e.g. absorbent material.”

9. There is no reason why IBCs should only be referred to in a Note and why no Special Packing Provision should be added to IBC08 instead as follows, hereby taking into account the comments made in paragraphs 5, 6 and 7 as they apply equally to IBCs.

“Bxx For UN 3xxx IBCs meeting the construction requirements of 6.5, made leak tight or fitted with a leak tight and puncture resistant sealed liner or bag, shall be used. The IBC is not required to meet the testing requirements of 6.5. When there is a risk that free liquid residues might escape during the transport, the packaging has to provide a means of retaining, e.g. absorbent material.

Before being filled and handed over for carriage, every IBC shall be inspected to ensure that it is free from corrosion, contamination or other damages. Any IBC showing signs of reduced strength, shall no longer be used (minor dents & scratches are not considered as reducing the strength of the IBC).

IBCs intended for the transport of packaging [waste] with residues of division 5.1 shall be so constructed or adapted that the goods cannot come into contact with wood or any other incompatible material.”

## On the new documentation requirement (5.4.1.4.3)

10. CEFIC supports the second option as it is in line with the requirements of other entries and thus more IT-friendly:

“3XXX [PACKAGING WASTE] (WITH RESIDUES OF 3, 4.1, 6.1), 9”

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