

INF. 48/Add. 1

Comments on INF.19 (Transport of packaging waste with residues of dangerous goods)

Submitted by ICCR, ICPP, EMPAC and ICIBCA

We offer the following comments on INF.19, the proposal from France made on behalf of the Joint Working Group regarding the transport of empty packaging with residue.

We propose that paragraph 12 of INF.19 be revised to read:

“yyy. This entry may only be used for packagings, large packagings or intermediate bulk containers (IBCs) or parts thereof, which are no longer meant to serve their original intended purpose, and are therefore transported for discard. This entry is not used for packagings, large packagings or intermediate bulk containers (IBCs), or parts thereof, which are transported for the purpose of reconditioning, repair, routine maintenance, remanufacture or reuse.

In addition, we suggest that the term “packaging waste” be deleted and replaced with “residue packaging for discard.”