

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

28 November 2011

Fortieth session

Geneva, 28 November – 7 December 2011

Item 2 (c) of the provisional agenda

Listing, classification and packing : miscellaneous

Comments on INF.24: Transport of uncleaned waste packaging having contained dangerous goods

Transmitted by ICPP, ICCR, ICIBCA, ICDM and EMPAC

1. ICPP, ICCR, ICIBCA, ICDM and EMPAC would like to thank the expert from the United Kingdom for tabling informal document 24 on the transport of uncleaned waste packaging containing residues of dangerous goods.
2. The implications of this proposal on industry could be significant and as these will vary from continent to continent depending on current procedures we would like to join the UK in exploring the problems and potential answers.
3. It is important for the Experts to understand that currently emptied un-cleaned packagings containing residues of dangerous goods are moved safely all over the world for reconditioning and reuse under agreed procedures in individual national legislation. In its present form, the UK proposal could disrupt this important transport activity and impose significant new costs on industry with no apparent safety improvement.
4. Our associations would like to stress that if new entries are made in the UN Recommendations on the Transport of Dangerous Goods then they should be specifically targeted at the transport of open/damaged un-cleaned packaging and ensure that national and regional provisions governing the transport of properly prepared empty packagings containing residue can still be used.
5. We thank the Sub-Committee for this opportunity to comment on INF 24 and look forward to working with interested Experts on this issue.