
Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Dangerous Goods****12 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 and INF.34
– Carriage of empty uncleaned packaging wastes****Transmitted by the Government of Denmark**

1. In -/2011/49 France proposes the introduction of provisions for packaging wastes. Denmark supports the aim of the proposals, but in our opinion, the proposals are too complex and not complete. In particular, it is not sufficiently clear to us, which provisions in RID/ADR apply and which could be deviated from.
 2. Also, it should be considered if empty, uncleaned packaging wastes include or exclude inner packagings, packagings that are not broken and packagings which have passed the permitted period of use, cf. 4.1.1.15.
 3. Sweden has presented an informal document 34 proposing to introduce provisions for packaging wastes in line with the existing provisions for empty, uncleaned packagings.
 4. Denmark supports the Swedish approach. However, in our opinion the Swedish proposal should be supplemented to reflect that some provisions of chapter 4.1 (e.g. 4.1.1.1 and 4.1.1.9) cannot be fulfilled by packaging wastes and should be deviated from. A possible solution could be to add special packing provisions to allow for special outer packagings (e.g. IBC's) and deviation from parts of chapter 4.1. Also the proposed definition should take into consideration the comment in paragraph 2, see above.
 5. Denmark would also suggest to add relaxed provisions for the marking of the outer packaging in line with the relaxed provisions for the transport document, suggested by Sweden. It could be achieved by adding the following text in a second paragraph to section 5.2.1.1: "If a package contains empty, uncleaned packaging wastes only, the marking may be replaced with "EMPTY UNCLEANNED PACKAGING WASTE". Labeling should be as already required in 5.2.2 and 5.1.4.
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