

**Economic Commission for Europe**

Inland Transport Committee

**Working Party on the Transport of Dangerous Goods****15 March 2013**

Joint Meeting of the RID Committee of Experts and the

**Working Party on the Transport of Dangerous Goods**

Bern, 18–22 March 2013

Item 6 of the provisional agenda

**Reports of informal working groups****Carriage of empty uncleaned packaging wastes – additional proposal to INF.9****Comments on France proposal in INF. 9****Transmitted by the Government of Switzerland***Summary*

<b>Executive summary:</b>	The proposal ensures that discarded, empty, uncleaned packagings still may be carried according to the current regulations of 4.1.1.11, with the same requirements as for filled packagings.
<b>Action to be taken:</b>	Amend Chapters 2.1 and 4.1.
<b>Related documents:</b>	WP.15/AC.1/March 2013/INF.9 WP.15/AC.1/March 2012/INF.31.

**Introduction**

1. Switzerland supports the proposal in INF.9 but believes further clarifications are necessary. We believe it is safe and should remain possible to carry empty packagings according to 4.1.1.11 (same requirements as for filled packaging) even if they meet the criteria to be assigned to UN 3509. Furthermore, the users should be informed in the general part of the regulation of the two possibilities they have when carrying empty packagings for disposal.
2. Following the definition in 2.1.1.2, UN 3509 PACKAGING DISCARDED, EMPTY, UNCLEANNED is a Generic entry of type B. According to the principles of classification of 2.1.2 this classification has precedence to other articles or substances of types B, C or D.
3. As a consequence, except for entries of type A (single entries for well defined substances or articles) it would not be possible to classify an empty packaging which meets the requirements of UN3509 according to the former contained dangerous and following the rules of 4.1.1.11. Only the UN 3509 and the corresponding special provision XYZ and transport conditions could be used.

4. For the same reason the existence of the new entry UN 3509 and the wording of the special provision XYZ would no more allow to carry empty packagings for disposal following the rules of 4.1.1.11 if the goods they contained belong to classes 1, 2, 4.2, 4.3, 5.2, 6.2 and 7, packing group I substances or substances having "0" assigned in Column (7a) of Table A of Chapter 3.2 or substances classified as desensitized explosives substances of Class 3 or Division 4.1, or self reactive-substances of Division 4.1 or Asbestos (UN 2212 and UN 2590), polychlorinated Biphenyls (UN 2315 and UN 3432) and polyhalogenated Biphenyls or polyhalogenated Terphenyls (UN 3151 and UN 3152).
5. It seems thus important to explain in Chapter 2.1 that the assignment to UN 3509 is one possibility but not the only one.
6. The following proposal intends to solve the problems mentioned above and clarify the situation.

## Proposal

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- 2.1.3.10** Discarded, empty, uncleaned packagings, large packagings or IBC, or parts thereof, carried for disposal, recycling or recovery shall be classified according to 4.1.1.11. They may be assigned to and carried in accordance with UN 3509 if they meet the requirements of this entry.

***"4.1.1.11 Empty packagings, including IBCs and large packagings,***

- 4.1.1.11.1 Carriage of Empty packagings, including IBCs and large packagings, that have contained a dangerous substance are subject to the same requirements as those for a filled packaging, unless adequate measures have been taken to nullify any hazard.
- 4.1.1.11.2 Discarded, empty, uncleaned packagings, large packagings or IBCs, or parts thereof, carried for disposal, recycling or recovery of their material may also be assigned to and carried in accordance with UN 3509 if they meet the requirements of this entry.

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