

OTIF



**ORGANISATION INTERGOUVERNEMENTALE POUR
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES**

**ZWISCHENSTAATLICHE ORGANISATION FÜR DEN
INTERNATIONALEN EISENBAHNVERKEHR**

**INTERGOVERNMENTAL ORGANISATION FOR INTER-
NATIONAL CARRIAGE BY RAIL**

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Working Party on the Transport of Dangerous Goods
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Item 5 (b) of the agenda: Proposals for amendments to RID/ADR/ADN – New proposals

Carriage of waste electrical and electronic equipment

Transmitted by Germany

Introduction

1. Within the framework of the implementation of Directive 2012/19/EU on waste electrical and electronic equipment, the question arose to what extent the provisions of RID/ADR apply to the collection and carriage of waste electrical equipment. In accordance with the Directive, waste electrical and electronic equipment has to be collected separately from municipal waste in order to send it for correct treatment either to prepare it for re-use or in the form of recovery and recycling measures.
2. Some of the collected waste electrical and electronic equipment also contains lithium batteries which means that this waste equipment has to be classified under UN 3091 or UN 3481 lithium batteries contained in equipment. Special provision 377 in conjunction with packing instruction P 909 applies to the carriage of these batteries.
3. In practice, however, transport operations are often carried out without dangerous goods provisions being observed. The waste electrical and electronic equipment is collected in different ways from the consumer, e.g. by means of collection points at retailers, collection bins in the public areas or collection points at municipal or private waste management companies. For

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this purpose, wire-mesh boxes, containers, skip containers or special collection vessels, among others, are deployed that are also used for carriage to the treatment facilities or whose contents are transferred to vehicles or containers. Example pictures are enclosed.

4. Paragraph 3 of packing instruction P 909 provides for unpackaged carriage of large equipment. However, the carriage operations actually performed are not covered by packing instruction P 909, as they are de facto carriage in bulk operations.
5. When waste electrical or electronic equipment is collected, usually, no distinction is drawn between the different items of equipment based on whether they contain lithium batteries or not. What is more, it is not known or not readily discernable at the time the waste equipment is collected whether it contains such batteries. In terms of the total mass of the collected waste electrical and electronic equipment, the share of lithium batteries is likely to be small. According to estimates by RECHARGE, the share of lithium batteries in the total mass of collected waste electrical and electronic equipment is less than 1 %. The share can, however, vary depending on the type of collection point.

Proposal

6. Germany is interested to know what experiences have been made by other states with the collection of waste electrical equipment. It is to be examined if and to what extent further options for the carriage of lithium batteries contained in equipment should be introduced into legislation and whether exemptions going beyond the current special provision 636 are necessary to carry out the collection operations required in accordance with Directive 2012/19/EU.

Examples of the collection and carriage of waste electrical and electronic equipment





