

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

Bern, 25-28 March 2008
Agenda item 5 (b)

PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN

Comments of Belgium on document ECE/TRANS/WP.15/AC.1/2008/1

Introduction

Belgium agrees with Switzerland that it is not necessary to require a correctly filled in transport document when health professionals carry small quantities of wastes of UN 3291.

The solution that is being proposed, however, is not appropriate for rail transport, where the exemptions related to quantities carried per transport unit (1.1.3.6 of ADR) do not exist. Moreover, it is not certain that this kind of carriage by rail really exists without being completely exempted (perhaps on RER and metro ?). The problem is in any case better addressed separately in WP.15 and the RID Committee of Experts.

For the carriage by road, the creation of yet another threshold value (15 kg) seems to be an unnecessary complication. An extension of the exemptions under 1.1.3.6 would be a more appropriate solution for this particular kind of transport. It is also not necessary to stipulate “in their personal vehicles or in service vehicles” ; the limitation to “performed by professionals as part of their health-care activities” is sufficient.

Moreover, it would no doubt be helpful to the people involved in this kind of carriage (the health professionals) if this provision would be introduced in 2.2.62 instead of in a special provision.

Proposal

In ADR, introduce an new 2.2.62.1.11.5 as follows :

“Carriage of wastes that are assigned to UN number 3291 and that are subject to the provisions of RID/ADR, shall not be subject to the provisions of 5.4.1 when the carriage is performed by professionals as part of their health-care activities, and when the other conditions of 1.1.3.6 are fulfilled.”
