
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

14 March 2012

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

Bern, 19–23 March 2012

Item 5(a) of the provisional agenda

Proposals for amendments to RID/ADR/ADN pending issues

Carriage of empty uncleaned packaging waste

Remarks of European Industrial Packaging industry represented by EMPAC, EuPC, SEFA, SEFFI and SERRED on the proposals of France, Belgium and UK regarding the carriage of empty un-cleaned packaging wastes

1. The European industrial packaging industry represented by EMPAC (European Metal Packaging Association), EuPC (European Plastics Converters), SEFA (European Association of Steel Drum Manufacturers), SEFFI (European Association of Fibre Drum Manufacturers) and SERRED (European Association of Drum Reconditioning) specialized in the production, recollection and reconditioning for reuse of industrial packaging are welcoming the proposal of France in ECE/TRANS/WP.15/AC.1/2012/9, in INF paper 16 of Belgium and in the proposal of UK regarding the carriage of empty un-cleaned packaging waste for disposal and recovery.
2. The above mentioned packaging associations would like to stress out that if new entries are made in the ADR/RID/ADN regulations they should be specifically targeted at the transport of open/damaged un-cleaned packaging, that is no longer fit for purpose and ensure that national and regional provisions governing the transport of properly prepared empty packaging containing residue can still be used.
3. It is important for the Experts to understand that currently emptied un-cleaned packaging containing residues of dangerous goods are moved safely all over the world for reconditioning and reuse under agreed procedures in the actual legislation on transport of dangerous goods.
4. For this reason the European industrial packaging industry would like to support the proposal of UK.
5. We thank the Committee for this opportunity to comment on these proposals and look forward to working with interested Experts on this issue.

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