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Item 5 (a) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: pending issues

FEAD Recommendations on transport of low pressure TL lamps under ADR regime

Transmitted by the European Federation of Waste Management and Environmental Services (FEAD)*,**

1. The following provisions may be found in ADR 2015:

“1.1.3.10 Exemptions related to the carriage of lamps containing dangerous goods

The following lamps are not subject to ADR provided that they do not contain radioactive material and do not contain mercury in quantities above those specified in special provision 366 of Chapter 3.3:

(a) Lamps that are collected directly from individuals and households when carried to a collection or recycling facility;

NOTE: This also includes lamps brought by individuals to a first collection point, and then carried to another collection point, intermediate processing or recycling facility.

(b) Lamps each containing not more than 1 g of dangerous goods and packaged so that there is not more than 30 g of dangerous goods per package provided that:

(i) The lamps are manufactured according to a certified quality management system;

* In accordance with the programme of work of the Inland Transport Committee for 2016-2017, (ECE/TRANS/2016/28/Add.1 (9.2)).

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NOTE: ISO 9001:2008 may be used for this purpose

and

(ii) Each lamp is either individually packed in inner packagings separated by dividers, or surrounded with cushioning material to protect the lamps and packed into strong outer packagings meeting the general provisions of 4.1.1.1 and capable of passing a 1.2 m drop test;

(c) Used damaged or defective lamps each containing not more than 1 g of dangerous goods with not more than 30 g of dangerous goods per package when carried from a collection or recycling facility. The lamps shall be packed in strong outer packagings sufficient for preventing release of the contents under normal conditions of carriage meeting the general provisions of 4.1.1.1. and that are capable of passing a drop test of not less than 1.2 m;

(d) Lamps containing only gases of Groups A and O (according to 2.2.2.1) provided they are packaged so that the projectile effects of any rupture of the lamp will be contained within the package.

NOTE: Lamps containing radioactive material are addressed in 2.2.7.2.2(b).

Special Provisions (chapter 3.3)

366 Manufactured instruments and articles containing not more than 1 kg of mercury are not subject to ADR

General Provisions (chapter 4.1)

4.1.1.1 Dangerous goods shall be packed in good quality packagings, including IBC's and large packagings, which shall be strong enough to withstand the shocks and loadings normally encountered during carriage, including transshipment between transport units and between transport units and warehouses as well as any removal from a pallet or overpack for subsequent manual or mechanical handling. Packagings, including IBC's and large packagings shall be constructed and closed so as to prevent any loss of contents when prepared for transport which might be caused, under normal conditions of transport, by vibration, or by changes of temperature, humidity or pressure (resulting from altitude, for example). Packagings, including IBC's and large packagings shall be closed in accordance with the information provided by the manufacturer. No dangerous residue shall adhere to the outside of the packagings, IBC's and large packagings during carriage. These provisions apply, as appropriate, to new, reused, reconditioned or remanufactured packagings and to new, reused, repaired or remanufactured IBC's and to new, reused or remanufactured large packagings."

2. At the autumn session of the RID/ADR/ADN Joint Meeting, 19-23 September 2016, FEAD submitted informal document INF.25.

This paper triggered several discussions between the delegations and some delegates supported FEAD recommendations.

3. The discussion on lamps was raised in a previous meeting of the United Nations Sub-Committee of experts on the transport of dangerous goods (2015), (ST/SG/AC.10/C.3/2015/19). The position of the Sub-Committee was reflected in the report (ST/SG/AC.10/C.3/94, para.74 on a proposal of Switzerland. In view of the next

session of the Joint Meeting, the problem could be solved by inserting a note in the ADR mentioning that:

“In accordance with special provision 366, lamps containing not more than 1 kg of mercury are not subject to land and sea dangerous goods transport regulations and those containing not more than 15 g mercury are not subject to air dangerous goods transport regulations.”

FEAD proposal of modification of the ADR:

4. In order to avoid any diverging interpretation, FEAD proposes the below modification of the ADR:

Include the following note at the end of 1.1.3.10 after the note on radioactive lamps:

NOTE: Low pressure mercury TL lamps, containing no other hazardous substances are not subject to ADR.”
