

## Economic Commission for Europe

### Inland Transport Committee

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

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#### 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: Alternative proposal for 2012/9 from the Government of France

#### Transmitted by the Government of Belgium

### Proposal

1. Add a new special provision to chapter 3.3, to read as follows:

**“6xw**

#### **Definition:**

For the purpose of this special provision, the term “Empty uncleaned packaging waste (EUPW)” is defined by: a non-conforming packaging, large packaging or intermediate bulk container (IBC), or a part thereof, which is carried for treatment<sup>1</sup>, and which has been emptied to the extent that no free liquid is present and only residues stuck to its internal or external walls (or part of walls) are present when it is handed over for carriage.

#### **Scope:**

This special provision may exclusively be used for the carriage of EUPWs containing residues of hazard Classes 3, 4.1, 5.1, 6.1, 8 or 9, except solids or liquids:

- Assigned to packing group I or which have “0” assigned in Column (7a) of Table A of Chapter 3.2;
- Classified as desensitized explosive substances of Class 3 or 4.1, or;
- Classified as self-reactive substances of Class 4.1,

EUPW's shall be classified under UN Nos. 7001, 7002, 7003 or 7004.

#### **General requirements:**

Unless otherwise specified in this special provision, all the relevant requirements of RID/ADR/ADN shall be met.

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<sup>1</sup> As defined in Article 3-14° of Directive 2008/98/EC of the European Parliament and of the Council of 19 November 2008 on waste and repealing certain Directives, as disposal operations and as recovery operations.

**Specific requirements for mixed packing and mixed loading:**

EUPWs may be packed or carried in bulk together or with non-dangerous goods, provided they do not react dangerously with each other.

Sorting procedures shall be implemented on the loading site to insure the respect of the requirements herein.

**Specific requirements for carriage of EUPW having contained goods with a Class 5.1 hazard or sub-hazard:**

Vehicles and containers shall be so constructed either that the substances contained cannot come into contact with wood or any other combustible material, or that the entire surface of the floor and walls, if made of wood or another combustible material has been provided with an impermeable surfacing resistant to combustion or has been coated with sodium silicate or a similar substance.

**Specific requirements for marking and labelling:**

In addition to the provisions of Chapter 5.2, packagings, IBCs or large packagings containing EUPWs shall bear all the labels corresponding to the Class of hazard or sub-hazard related to each residue present in the EUPWs.

**Specific requirements for documentation:**

The sequence mentioned in paragraph 5.4.1.1.1 shall be complemented with the Class of hazard or sub-hazard corresponding to the residues. The class of hazard or sub-hazard shall be entered in brackets immediately after the proper shipping name. An appropriate modifier such as residues or contained may also be used.

Example: an EUPW having contained a flammable liquid with a subsidiary risk of corrosivity should be referred to in the transport document as

UN 7001, Empty uncleaned packaging waste (residues 3,8), 9.”.

2. Add the following packing instructions:

- In 4.1.4.1:

<b>P7000</b>	<b>PACKING INSTRUCTION</b>	<b>P7000</b>
This instruction applies to UN Nos. 7001, 7002, 7003, 7004.		
The following packagings are authorized, provided that the general provisions of <b>4.1.1</b> and <b>4.1.3</b> are met:  Suitable [rigid] metal or plastic packagings conforming to the requirements of Chapter 6.1 for solids, at the packing group II performance level. Packagings shall be capable of retaining liquids, e.g. by means of a suitable liner.		
<b>Additional requirements:</b>  For UN 7002, 7003, 7004: these packagings shall be capable of passing the leakproofness test specified in 6.1.5.4 at the packing group II performance level.		

- In 4.1.4.2:

<b>IBC7000</b>	<b>PACKING INSTRUCTION</b>	<b>IBC7000</b>
This instruction applies to UN Nos. 7001, 7002, 7003, 7004		

The following IBCs are authorized, provided that the general provisions of 4.1.1, 4.1.2 and 4.1.3 are met:

- (1) Metal, rigid plastic or composite IBCs approved for solids for Packing Group II ;
- (2) IBCs approved for solids for Packing group II and of types 13H3, 13H4 or 13H5, [placed in rigid overpacks with complete base and sidewalls].

IBC's shall be capable of retaining liquids, e.g. by means of a suitable liner.

**Additional requirements:**

For UN 7002, 7003, 7004: these IBCs shall be capable of passing the leakproofness test specified in 6.5.6.7 at the packing group II performance level.

- In 4.1.4.3:

LP7000	PACKING INSTRUCTION	LP7000
This instruction applies to UN Nos. 7001, 7002, 7003, 7004.		
<p>The following large packagings are authorized, provided the general provisions of 4.1.1 and 4.1.3 are met:</p> <p>[Rigid] large packagings conforming to the requirements of Chapter 6.6 for solids, at the packing group II performance level. Large packagings shall be capable of retaining liquids, e.g. by means of a suitable liner.</p> <p><b>Additional requirements:</b></p> <p>For UN 7002, 7003, 7004: EUPWs shall be placed in leakproof inner packagings in accordance with P7000.</p>		

3. Consequential amendments:

- (a) At the end of 1.1.3.5, add the following new Note:

"NOTE: This exemption does not apply to empty uncleaned packaging wastes (EUPWs). For EUPWs, refer to dangerous good identification numbers 7001 to 7004 and special provision 6xw of Chapter 3.3."

- (b) At the end of 2.2.9.1.2, insert the following new subdivision:

"M12 Empty uncleaned packaging wastes (EUPWs) containing residues presenting risks or subsidiary risks corresponding to Classes 3, 4.1, 8 or 9. See special provision 6xw of Chapter 3.3."

- (c) In 2.2.61.1.2, after "T9 Other toxic substances", insert the following subdivision:

"T10 Empty uncleaned packaging wastes (EUPWs) containing residues presenting risks or subsidiary risks corresponding to Class 6.1 and which may present risks or subsidiary risks corresponding to Classes 3, 4.1, 8 or 9. See special provision 6xw of Chapter 3.3."

- (d) In 2.2.51.1.2, after "O3 Articles", insert the following new subdivision:

"O4 Empty uncleaned packaging wastes (EUPWs) containing residues presenting risks or subsidiary risks corresponding to Class 5.1 exclusively. See special provision 6xy of Chapter 3.3."

- (e) In 2.2.51.1.2, after "OT2Solid", insert the following new subdivision:

"OT3 Empty uncleaned packaging wastes (EUPWs) containing residues presenting risks or subsidiary risks corresponding to Class 5.1, toxic. See special provision 6xy of Chapter 3.3."

## Annex

### New entries in Table A of Chapter 3.2

(1)	(2)	(3a)	(3b)	(4)	(5)	(6)	(7a)	(7b)	(8)	(9a)	(9b)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
7001	EMPTY UNCLEANNED PACKAGING WASTE (EUPW), containing flammable, corrosive or environmentally hazardous residues, non toxic, non oxidizing	9	M12		9	6xw	0	E0	P7000 IBC7000 LP7000			BK1 BK2					[4 (E)]		VV10			90
7002	EMPTY UNCLEANNED PACKAGING WASTE (EUPW), containing flammable, corrosive or environmentally hazardous residues, toxic or with a subsidiary risk of toxicity, non oxidizing	6.1	T10		6.1	6xw	0	E0	P7000 IBC7000 LP7000			BK1 BK2					[4 (E)]		VV10			60
7003	EMPTY UNCLEANNED PACKAGING WASTE (EUPW), containing oxidizing residues or residues presenting an oxidizing subsidiary risk, non toxic	5.1	O4		5.1	6xw	0	E0	P7000 IBC7000 LP7000		MP2	BK1 BK2					[4 (E)]		VV10			50
7004	EMPTY UNCLEANNED PACKAGING WASTE (EUPW), containing oxidizing residues or residues presenting an oxidizing subsidiary risk, toxic	5.1	OT3		5.1 +6.1	6xw	0	E0	P7000 IBC7000 LP7000		MP2	BK1 BK2					[4 (E)]		VV10			56

## Justification

- The basis for the redrafted proposal was option B of 2012/9 from France.
  - The definition was amended to include that EUPWs are non-conforming packagings (for UN conforming packagings, 1.1.3.5 or 1.1.3.6 is used) and the scope for the final destination of the EUPW was enlarged from “for disposal” to “for disposal and recovery” via reference in line with the used terminology in the European waste directive. The term “disposal” is too narrow and does not cover for instance using the EUPWs as fuels.
  - The packing instructions have been redrafted to be more consistent in their requirements:
    - P7000: PG II performance level for solids, retention of liquids, leakproofnesstest only for toxic and oxidizing substances
    - IBC7000: PG II performance level for solids, retention of liquids, leakproofnesstest only for toxic and oxidizing substances
    - LP7000: PG II performance level for solids, retention of liquids, no leakproofnesstest available so instead a combination packaging with inner packaging conforming to P7000 for toxic and oxidizing substances
  - UN 7004 was added and is required for toxic and oxidizing substances representing both risks. Both 6.1 and 5.1 labels are required for adequate hazard communication, eg. EUPWs with residues of UN 3086 Toxic solid, oxidizing, n.o.s.
  - Limiting the entries to a general class 9 entry for environmental, flammable and corrosive risks and 3 entries for oxidizing and toxic risks allows practicality for the industry without having to add the details of providing an entry for every individual risk but at the same time allows sufficient flexibility to tighten the provisions for certain hazard classes.
  - VV10 was attributed to all the proposed UN entries, as the requirements of VV8 are taken over in essence in a specific requirement for EUPWs having contained goods of class 5.1.
  - The requirement “rigid” was placed in square brackets in the packing instructions for separate evaluation, as well as the attribution of transport category 4 and the tunnel code.
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