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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, 10–11 September 2020 and Geneva, 14–18 September 2020
Item 6 of the provisional agenda
Reports of informal working groups

Proposal on the carriage in bulk of waste containing asbestos

Transmitted by the Government of France*, **

Summary

- Executive summary:** This proposal aims to set conditions for the carriage in bulk of certain types of waste containing asbestos.
- Action to be taken:** Amend Table A of Chapter 3.2 and Chapters 3.3, 5.4, 7.3 and 7.5 of RID/ADR.

Introduction

1. RID/ADR prohibits the carriage of asbestos in bulk (UN Nos. 2212 and 2590). The informal working group on the transport of hazardous waste, which met in Utrecht, the Netherlands, from 3 to 4 March 2020, discussed this item and found it necessary in certain cases to allow for the carriage of asbestos in bulk under certain conditions.
2. French national regulations provide for a derogation under article 6 (2) (b) (i) from Directive 2008/68/EC (derogation RO-bi-FR-6) for the local transport of waste, which allows for the carriage in bulk of material contaminated with asbestos under certain conditions. The informal working group requested the Government of France to submit a proposal to the Joint Meeting to introduce this possibility into RID/ADR.
3. The carriage of asbestos is only permitted subject to compliance either with special provision 168 (in the case of bonded asbestos not emitting asbestos fibres), exempting the carriage from the provisions of RID/ADR, or with the provisions of RID/ADR, in particular

* Subprogramme 2 of the programme budget for 2020 (A/74/6 (Sect. 20) and additional information).

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packing instructions P002, IBC08 or R001 in cases where asbestos fibres could be released during carriage.

4. A number of civil engineering or public works sites generate large quantities of solid waste containing asbestos. In particular, these are sites involving:

- Road surface milling or planing operations
- Post-disaster (fire, etc.) demolition or rehabilitation of works or buildings
- Asbestos-contaminated soil

5. These types of sites can generate waste whose quantity or size or both make it very difficult to apply the packing instructions in Chapter 4.1. In addition, it has been found by the occupational health and safety authorities that filling of packagings that comply with RID/ADR increases the risk of exposure related to the release of carcinogenic dusts and fibres for packaging workers, while the bulk loading procedure reduces dangerous exposure to asbestos for workers.

6. In the cases referred to in paragraph 3, the materials contain asbestos that initially may well have met the requirements of special provision 168 but no longer do so as a result of demolition work.

7. Faced with this problem, France has sought a solution that would allow for the carriage in bulk of waste under acceptable safety conditions.

8. Their carriage in bulk is thus permitted in packaging known as “container bags” consisting of two casings (whether integral or not), which ensure that the waste contained in them is completely covered and are provided with a sufficiently leakproof closure to prevent the asbestos fibres from being released in dangerous quantities during carriage. These container bags must be resistant to punctures and tears that the waste contained in them could generate.

9. Container bags are only intended to prevent fibres and dust from escaping; they do not have sufficient mechanical strength to be handled, and they are contained in bulk containers or bulk load compartments with solid complete walls.

10. These packaging rules are accompanied by procedures to ensure the safe loading and unloading of waste. In particular, container bags are subject to regulations to guarantee their integrity during the various transport and loading/unloading operations.

11. These derogations have been implemented in France since 2018 on a large number of construction sites and have not given rise to any safety problems during transport. The safety of asbestos removal sites has been improved.

12. At the invitation of the informal working group, the technical provisions applicable nationally in France were presented in a form adapted to the structure of RID/ADR and are included in special provisions and provisions for carriage in bulk with a view to facilitating their consideration by the Joint Meeting and initiating a discussion on the relevance of introducing such provisions into RID/ADR, depending on their usefulness for international transport.

Proposals

13. Proposal 1

In table A of Chapter 3.2:

For UN Nos. 2212 and 2590, add “6xx” in column (6). In column (17), add “VC1”, “VC2” and “AP1x”. In column (18), add “CW/CV3x”.

14. Proposal 2

In 3.3.1, add the following special provision:

“6xx: This item may be used provided the conditions of this special provision are met.

The following waste containing asbestos may be transported under this entry, in bulk, from the production site to the final storage site:

- Solid waste from roadworks, such as asphalt milling waste or other waste resulting from the demolition of road asphalt contaminated with non-bonded asbestos; or
- Solid waste contaminated with non-bonded asbestos from demolition sites or the sites of post-disaster rehabilitation of structures or buildings. This waste includes soil contaminated with non-bonded asbestos after a disaster or waste from working sites or objects, such as furniture or construction elements, contaminated by non-bonded asbestos from damaged structures or buildings.

Waste meeting these conditions may be carried in accordance with transport provisions VC1 or VC2 of 7.5.11 and AP1x of 7.3.3.2.7 for carriage in bulk provided it is not mixed with other waste, whether solid or not, or dangerous or not, contaminated with non-bonded asbestos.”

15. Proposal 3

In Chapter 5.4, add the following 5.4.1.2.6:

“5.4.1.2.6 *Additional provisions for Class 9*

For the carriage of wastes containing asbestos assigned to UN Nos. 2212 or 2590 under special provision 6xx of Chapter 3.3, in addition to the particulars required in 5.4.1.1, the transport document shall bear the following additional entry:

- “Roadworks waste contaminated with non-bonded asbestos”
- “Waste from post-disaster rehabilitation sites contaminated with non-bonded asbestos”
or
- “Waste from post-disaster demolition sites contaminated with non-bonded asbestos”

along with, as appropriate, the place of departure (address of the site of public works or demolition or rehabilitation of the structures or buildings affected) and the place of arrival (address of the waste storage site) of the transport operation.”

16. Proposal 4

In 7.3.3.2.7, add the following special provision concerning carriage:

“AP1x The transport vehicles shall be equipped with Ampliroll-type removable skips or skips for public works. Skips equipped with automatic rear door closure systems and rock-fill skips shall be prohibited. The skips shall not have any inside surface irregularity (interior ladder, etc.) that could tear the container bag during unloading. Under this special provision, the presence of sheets on the skips is not mandatory.

The waste loaded in these skips shall be transported in large bags known as “container bags” corresponding to dimensions of the skip, in accordance with the provisions of 7.3.1.3, 7.3.1.4, 7.3.1.7 and 7.3.1.8. It shall be prohibited to use several smaller container bags in the same skip for the transport of such waste.

These container bags shall consist of at least two casings, bound together or separate. The inner casing shall be made dustproof to prevent the release of asbestos fibres in dangerous quantities during transport.

The outer casing shall ensure the mechanical strength of the container bag loaded with the waste against the shocks and loadings normally encountered during carriage, in particular during the transhipment of the skip loaded with its container bag between cargo transport units or between cargo transport units and storage sites.

The container-bags shall also be resistant to punctures and tears that the waste or contaminated objects packed in them may cause because of their angles or roughness.

The container bags shall have a sufficiently tight closure system to prevent asbestos fibres from escaping in dangerous quantities during transport.

The maximum mass of waste specified by the container bag manufacturer for the strength of the bag shall be complied with.

Roadworks waste contaminated with non-bonded asbestos or soil contaminated with non-bonded asbestos shall be transported in a single container bag, provided that the maximum permissible mass of waste defined above is complied with.

Waste or objects contaminated with non-bonded asbestos coming from sites for the rehabilitation or demolition of damaged structures or buildings shall be transported in a container bag double lined with a bag of the same type. The total mass of waste shall be limited to a maximum of 7 tonnes.”

17. Proposal 5

In 7.5.11, add an additional provision as follows:

“CW/CV3x During trans-shipment, any manoeuvre aimed at transferring a container bag loaded with waste from one skip to another shall be prohibited.

The unloading of container bags is best carried out with the transport container placed on the ground.

The unloading by tipping of container bags loaded with working site waste or objects contaminated with non-bonded asbestos from damaged structures or buildings shall be prohibited.

The tipping of container bags loaded with waste from roadworks sites contaminated with non-bonded asbestos or from soil contaminated with non-bonded asbestos shall be permitted subject to compliance with an unloading agreement established jointly by the carrier and the consignee managing the final storage site aimed at preventing any tearing of the container bag during unloading.”
