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Item 6 of the provisional agenda
Reports of informal working groups

Information on the quantity transported in the transport document

Transmitted by European Federation of Waste Management and Environmental Services (FEAD) on behalf of the informal working group on the transport of hazardous waste^{*,}**

Summary

- Executive summary:** The topic on requirements for the entry “quantity transported in the transport document” is resumed considering the practical feasibility of the provisions, in view of solutions currently existing at national level (German and Austrian case).
- Action to be taken:** Amendments of RID/ADR 5.4.1.1.1 (f) are proposed.

Introduction

1. This proposal is the result of the informal working group dedicated to the transport of (hazardous) waste of the Joint Meeting. It is relevant to note that the informal working group met in two different occasions: a first in April 2019 in Brussels (see ECE/TRANS/WP.15/AC.1/2019/34), and a second one in March 2020 in Utrecht (see ECE/TRANS/WP.15/AC.1/2020/59). The modifications proposed in the present document are the result of the second meeting and agreed by its participants in that occasion.
2. This document considers the problematics arising from the provision on “quantity transported in the transport document” outlined in RID/ADR 5.4.1.1.1 (f). In particular, it

* 2020 (A/74/6 (Sect.20) and Supplementary, Subprogramme 2).

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deals with the introduction of the information of weight in the transport document and issues arising from this specific provision.

Background

3. For practical reasons, it is sometimes not feasible to put the exact weight of the waste in the transport document. There should be a certain degree of tolerance by having an estimated quantity for waste, as it is allowed on the specific waste consignment note set by environmental legislation. The exact weight is always measured and recorded in the waste register of the treatment plant. It is only during transport that it is not always possible to know the exact weight of the waste as the loader does not always provide this information. A solution within RID/ADR is desirable, for packaged waste as well as for bulk transport of waste.

4. It is also relevant to note that current provisions on estimation of the weight exist within national provisions of certain countries, namely Germany (German exemption 18) and Austria (multilateral agreement RID 1/2015 / M287, point 6.1).

Proposal

5. Amend RID/ADR 5.4.1.1.1 as follows:

After paragraph (f), introduce an additional note:

“NOTE 3: Where dangerous goods have a waste status and there is no possibility to weight the waste at the place of loading, the weight will be estimated in function of the nominal volume of each container, tank or packaging. In the latter case, a list of packagings including the type and the nominal volume will be added.”

6. In particular, the following limitations should apply:

- (a) An estimation of the weight (based on nominal volume) is acceptable for waste falling under RID/ADR classification and when the full RID/ADR is applied, except in case an exemption is applied (1.1.3.6);
- (b) The note cannot be used for dangerous goods having a waste status containing:
 - Substances mentioned in 2.1.3.5.3;
 - Substances of Class 4.3;
 - Substances of case mentioned in 2.1.3.7; or
 - Substances which are not accepted for carriage in accordance with 2.2.x.2;
- (c) For what concerns tanks, enough information on the degree of filling is available;
- (d) For vacuum tanks, an estimation is justified.

Justification

7. This proposal clarifies the situation faced in waste management and has no significant effect on the current risk level.
