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Item 6 of the provisional agenda

Reports of informal working groups

Transport of UN 3509 in sheeted bulk containers or wagons/vehicles (and not only closed)

Transmitted by the 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: This document resumes the position of the informal working group dedicated to the transport of (hazardous) waste on the transport of UN No. 3509 in sheeted bulk containers or wagons/vehicles compared to sheeted transport authorized for UN Nos. 3175 and 3243.

Action to be taken: Addition of VC1 for UN No. 3509 in column (17) of Table A of Chapter 3.2 is 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 summarizes discussions on sheeted transport not authorized for UN No. 3509, but authorized for UN Nos. 3175 and 3243. This document aims at highlighting

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

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that the transport of UN No. 3509 discarded, empty, uncleaned packaging doesn't entail additional risks compared to UN Nos. 3175 and 3243.

Background

3. In several countries, closed transport units are not the usual way of working. Sheeted transport is authorized for UN Nos. 3175 and 3243 (both UN entries are often used to cover waste transport), but not for UN No. 3509. For this entry, it is authorised only via certain national derogations including Multilateral Agreement M287 initiated by Austria.

4. The potential risk in case of transport of UN No. 3509 discarded, empty, uncleaned packaging is not higher than for the transport of e.g. UN No. 3243 solids containing toxic liquids, for which the use of a VC1 container is allowed.

5. The following provisions currently exists in national legislations, namely Austria (Multilateral Agreement M287) and Belgium (national derogation 15-2016):

(a) Austria (Multilateral Agreement M287):

“4.2 UN 3509 packagings, discarded, empty, uncleaned, may be carried under the terms of BK1 or VC1 instead of BK2 or VC2, provided all the other conditions remain the same”;

(b) Belgium (national derogation 15-2016):

“In derogation from paragraph 7.3.2.1 of ADR, the transport of UN 3509 discarded packaging, empty uncleaned in sheeted bulk container is authorized”.

Proposal

6. Addition of VC1 in Table A of Chapter 3.2, in column (17), for UN No. 3509.

Justification

7. The use of VC1-containers is a standard way of working in the waste management sector.

8. Open containers facilitate the loading of waste and limit the manipulation of waste.

9. Risk during the loading/unloading is reduced as top loading is possible and has no significant effect on the current risk level.