

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

11 March 2021

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

Bern, 15-19 March 2021

Item 6 of the provisional agenda:

Reports on informal working groups

Comment on ECE/TRANS/WP.15/AC.1/2021/18: Information on the quantity transported in the transport document

Transmitted by the Government of Spain

Summary

Executive summary: Editorial improvements to document
ECE/TRANS/WP.15/AC.1/2021/18.

Introduction

1. Spain has been following with interest the work carried out by the Working Group on transport of hazardous waste, even if we have not been able to participate in it, and the discussion of the different documents in the Joint Meeting.
2. Spain has submitted the comments contained in this informal document to FEAD in January 2021, and resubmits them as informal document, following FEADs request, to be able to facilitate to all the delegates an overview of the proposed amendments.
3. Spain supports in principle the proposals in ECE/TRANS/WP.15/AC.1/2021/18; nevertheless, we think that the text needs some further clarifications to avoid future interpretation problems.
4. Of the two alternatives presented, Spain strongly favours option B. As 5.4.1.1.1 is for general information, but 5.4.1.1.3 is for transport of wastes, and therefore the appropriate paragraph for introducing specific considerations on wastes.
5. Nevertheless, option A contains points (a), (b), (c) and (d), and it seems necessary to include (c) and (d) also into option B. Perhaps not including them into option B is an oversight, and this should be corrected. If this is not the case, we would like to know the explanation for not including them.
6. Additionally, as the text in option B is not part of a note, but part of the text, no reference to a note should be made in option B, point (b).
7. Finally, we would have several editorial suggestions to simplify the text, which we reproduce for you below. In this, we have tried to use the usual RID/ADR language. We have avoided to use the term “waste status”, because this seems to imply a formal declaration, which is not the case. And we have tried to simplify the text as much as possible, avoiding double negations.

Proposal

8. The proposed amendments would be:

Amend RID/ADR 5.4.1.1.3 by adding the following text:

“If there is no possibility to measure the quantity of the waste at the place of loading, the quantity of waste carried out falls under the RID/ADR and there is no possibility to measure the quantity of the waste at the place of loading, the quantity (volume or generally mass) will be estimated in function of the nominal volume of each container, tank or packaging used for the carriage. In the this latter case, a list of packaging including the type and the its nominal volume will be added to the transport document. In particular, the following limitations should apply:

(a) An estimation of the mass (based on nominal volume) is acceptable for waste falling under RID/ADR classification and when the full RID/ADR is applied, unless

~~Except~~

~~(a) in case an~~ **An exemption is applied (for example 1.1.3.6);**

~~(b) The note cannot be used for dangerous goods having a~~ **The 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 shall be available.**

~~(d) For vacuum tanks, the an~~ **estimation is shall be justified.”**

The “clean version” of the text would read as follows:

“If there is no possibility to measure the quantity of the waste at the place of loading, the quantity of waste carried under RID/ADR will be estimated in function of the nominal volume of each container, tank or packaging used for the carriage. In this case, a list of packaging including the type and its nominal volume will be added to the transport document. An estimation of the mass (based on nominal volume) is acceptable for waste falling under RID/ADR classification, unless:

(a) An exemption is applied (for example 1.1.3.6);

(b) The waste contains:

- 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.

For tanks, enough information on the degree of filling shall be available. For vacuum tanks, the estimation shall be justified.”