

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Working Party on the Transport of Dangerous Goods

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Item 6 of the provisional agenda:

Reports on 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 (Germany and Austria).
Action to be taken:	Amendments of RID/ADR 5.4.1.1.1 (f) are proposed.
Related document:	ECE/TRANS/WP.15/AC.1/2021/18

Introduction

1. This proposal is the result of the informal working group on the transport of (hazardous) waste of the Joint Meeting. It is relevant to note that the informal working group met at two different occasions: a first time in Brussels in April 2019 (see ECE/TRANS/WP.15/AC.1/2019/34), and a second time in Utrecht in March 2020 (see ECE/TRANS/WP.15/AC.1/2020/59).

A first working document (ECE/TRANS/WP.15/AC.1/2020/61) was submitted to the Joint Meeting at its autumn 2020 session (Geneva, 14–18 September 2020). The Joint Meeting supported the proposed modifications but asked for some finetuning and clarifications on the scope. The document was again discussed during the third and fourth meetings of the informal working group on the transport of hazardous waste (virtual meetings on 7 October 2020 and 19 November 2020). The following proposal is the result of these meetings.

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 deals with the introduction of the information of quantities (volume or mass) in the transport document and issues arising from this specific provision.

3. As there are two possibilities to introduce specific rules related to the carriage of waste, the participants of the informal working group decided to submit a formal text to the Joint Meeting, but to leave the decision to the Joint Meeting on the exact place where to introduce the text into the ADR:

Option A: add a note 3 under ADR 5.4.1.1.1 (f);

Option B: as the note to add is quite long and as 5.4.1.1.3 is dealing with special provisions on wastes, this can also be a valuable option.

Background

4. For practical reasons, it is sometimes not feasible to put the exact quantity of the waste in the transport document. There should be a certain degree of tolerance by having an estimated quantity for waste, as this is allowed on the specific waste consignment note set by environmental legislation. The exact quantity is always measured and recorded in the waste register of the treatment plant (conform the environmental permits quantities are recorded as mass). It is only during the transport that it is not always possible to know the exact quantity 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.

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

Proposal

6. OPTION A: Amend RID/ADR 5.4.1.1.1 as follows: After paragraph (f), introduce an additional note (*amendments to the proposal in ECE/TRANS/WP.15/AC.1/2021/18 are marked in track-changes*):

“NOTE 3: Where the 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, vacuum tank or packaging. In the latter case, a list of packaging including the type and the nominal volume will be added.

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, except in the 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;

~~(e) For what concerns tanks, enough information on the degree of filling is available;~~

(c) For vacuum tanks, ~~the~~ an estimation shall be justified.”

7. OPTION B: Amend RID/ADR 5.4.1.1.3 by adding at its end the following:

“In derogation of article 5.4.1.1.f, if there is no possibility to measure the quantity of the waste at the place of loading, the quantity of waste carried waste carried out falls under the RID/ADR expressed in volume or mass 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, vacuum tank or packaging used for carriage. In ~~this latter~~ case, a list of packaging including the type and the nominal volume will be added to the transport document.”

~~In particular, the following limitations should apply:~~

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

~~in case (a)~~ an exemption is applied (for example 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 vacuum tanks, the estimation shall be justified."

Justification

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