

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

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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 (Germany and Austria).

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 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 one 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.

Background

3. 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 solid waste and for waste transported in vacuum operated waste tanks. It is however not necessary for tanks other than vacuum operated waste tanks.

4. 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

5. Amend RID/ADR 5.4.1.1.3 as follows:

Provision 5.4.1.1.3 becomes paragraph 5.4.1.1.3.1.

A new paragraph 5.4.1.1.3.2 is hereby inserted:

“If there is no possibility to measure the exact quantity of the waste at the place of loading, the quantity according to 5.4.1.1.1(f) may be estimated for the following cases under the following conditions:

- (i) for packaging, a list of packaging including the type and the nominal volume will be added to the transport document.**
- (ii) for containers, the estimation will be based on their nominal volume and other available information, e.g. type of waste, average density, degree of filling.**
- (iii) for vacuum operated waste tanks, the estimation shall be justified, e.g. by means of an estimation provided by the consigner or by vehicle equipment.**

Such estimation of the quantity is not allowed for:

- (a) exemptions for which the exact quantity is essential (e.g. 1.1.3.6);**
- (b) waste containing substances mentioned in 2.1.3.5.3 and/or substances of Class 4.3;**
- (c) tanks other than vacuum operated waste tanks”.**

Justification

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