

## 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

3 March 2022

Bern, 14-18 March 2022

Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/AND:  
new proposals

### Comments on ECE/TRANS/WP.15/AC.1/2022/15 - Carriage of paint residues (waste) (Special provision 650)

Transmitted by the Government of France

#### Introduction

1. France would like to thank Sweden for the proposal to amend special provision 650, by including in its scope the residues of paints assigned to UN 3082.
2. However, the mixed packaging of flammable paints residues (UN 1263) and water-based paints (UN 3082) as proposed poses a problem related to marking and labelling of such packages. This issue has also some consequences on bulk transport (placarding and marking) and information contained in the transport document.
3. Indeed, in SP 650 (a) it is proposed to add “Mixed packing of waste classified as UN 1263 and waste classified as UN 3082 is permitted”. The same possibility contained in paragraph (d) concerning the carriage of such wastes in bulk needs also to be considered.
4. A question arises concerning the marking and labelling (or placarding) which shall be affixed on such packages or transport unit. In order to clarify this point France is of the opinion that such mixed packing or mixed loading should be assigned to UN 1263, conforming to Chapter 2.1 of RID/ADR/ADN. We believe that this simplifies labelling issues by avoiding multiple and potentially confusing labels. In this case it seems preferable to retain only the label linked to the highest danger.

#### Proposal

5. Modify the wording proposed in document -2022/15 as follows (new text in **bold underlined**):

“650 Waste consisting of packaging residues, solidified residues and liquid residues of paint may be carried under the conditions of UN No. 1263, packing group II, or UN No. 3082, as appropriate.

In addition to the provisions for UN No. 1263 packing group II, and UN No. 3082, the waste may also be packed and carried as follows:

- (a) The waste may be packed in accordance with packing instruction P002 of 4.1.4.1 or to packing instruction IBC06 of 4.1.4.2. **Mixed packing of waste classified as UN 1263 and waste classified as UN 3082 is permitted. In case of such mixed packing the totality of the content should be assigned to UN 1263;**
- (b) The waste may be packed in flexible IBCs of types 13H3, 13H4 and 13H5 in overpacks with complete walls;

- (c) Testing of packagings and IBCs indicated under (a) or (b) may be carried out in accordance with the requirements of Chapters 6.1 or 6.5, as appropriate, in relation to solids, at the packing group II performance level.

The tests shall be carried out on packagings and IBCs, filled with a representative sample of the waste, as prepared for carriage;

- (d) Carriage in bulk in sheeted wagons, movable roof wagons / in sheeted vehicles, closed containers or sheeted large containers, all with complete walls is allowed. Waste classified as UN 1263 may be mixed and loaded with waste classified as UN 3082 in the same wagon/vehicle or container. In case of such mixed loading the totality of the content should be assigned to UN 1263. The body of wagons/vehicles or containers shall be leakproof or rendered leakproof, for example by means of a suitable and sufficiently stout inner lining;

- (e) If the waste is carried under the conditions of this special provision, the goods shall be declared in accordance with 5.4.1.1.3 in the transport document, with the appropriate UN number(s) as follows:

“UN 1263 WASTE PAINT, 3, II (ADR only:), (D/E)”, or

“UN 1263 WASTE PAINT, 3, PG II (ADR only:), (D/E)”, or

“UN 3082 WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (PAINT), 9, III (ADR only:), (-)”, or

“UN 3082 WASTE ENVIRONMENTALLY HAZARDOUS SUBSTANCE, LIQUID, N.O.S. (PAINT), 9, PG III (ADR only:), (-)”.

**In case of mixed packing or mixed bulk loading of waste assigned to UN 1263 and UN 3082 only the information related to UN 1263 should be applied in the transport document.**

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