

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**

10 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) – Amending and assigning special provision 650 to UN 3082 transmitted by the Government of Sweden

INF.17 transmitted by the Government of France on the same issue

INF.18 transmitted by the Government of Germany on the same issue

Transmitted by European Federation of Waste Management and Environmental Services (FEAD)

Introduction

1. FEAD would like to thank the governments of Sweden, France and Germany for their proposals to amend
 - a. special provision 650,
 - b. transitional provision 1.6.1.51 as expressed in the INF 18-document of the Government of Germanyand to advocate for an updated version of Multilateral agreement M343 in order to integrate the waste issue in the transport of paints.
2. Considering the transitional period set in 1.6.1.51 and the effects of the new classification as from 01.03.2022 of some water-based paints as dangerous goods on the global market of these products, it is expected that the industry will use this period to develop alternative products with similar properties but avoiding their classification as dangerous goods.
3. Considering the fact that the waste sector will be asked to manage waste from products put on the market before 01.03.2022 during several years and that we expect, as mentioned under 2 a reduced production of water-based paints classified as dangerous goods, it is important for the sector to maintain the 2 possibilities of transport, being (1) the transport of dangerous paints under ADR and (2) the transport of non-dangerous paints outside the ADR.

Position

4. FEAD supports the above-mentioned documents, especially the option 2 to amend the transitional provision as expressed in the INF 18-document of the Government of Germany.
 5. In addition, FEAD suggests the following slight adjustments:
 - a. In the modifications proposed to Special provision 650 (document ECE/TRANS/WP.15/AC.1/2022/15), it should be specified under point 5. (a) and 5. (d), that mixed packaging of waste / waste classified as UN 1263 may only be mixed and loaded with waste **water-based paints** classified as UN 3082.*
 - b. In relation to the last sentence in INF.17 submitted by the Government of France commenting on ECE/TRANS/WP.15/AC.1/2022/15 ('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), it should be explicitly mentioned that the **TOTAL weight of both UN Numbers is to be mentioned on the transport document.**
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* Including the proposal by the Governments of Sweden and France, Special provision 650(a) would read: '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 water-based paints classified as UN 3082 is permitted. In case of such mixed packing the totality of the content should be assigned to UN 1263'. Special provision 650(d) would read: '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 water-based paints 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.