

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

Geneva, 12-16 September 2022

Item 5 (b) of the provisional agenda

6 September 2022

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

Last mile deliveries – Support and comments on document ECE/TRANS/WP.15/AC.1/2022/27 from COSTHA

Transmitted by the European Aerosol Federation (FEA)

Introduction

1. FEA would like to express its support for the concept presented in proposal 1 of working document ECE/TRANS/WP.15/AC.1/2022/27 (COSTHA).

Comments

2. The practical challenges posed by the transport after pick-and-pack from a local distribution warehouse or a shop to a final user, explained in document ECE/TRANS/WP.15/AC.1/2022/27 are in fact identical to those after pick-and-pack from a local distribution warehouse to a point of sale, which could for example be a shop, drugstore or pharmacy. In both cases the inner packagings or articles are originally in outer packagings conforming with the limited quantity chapter or with fully declared goods then in combination packagings. Consequently, FEA considers that the scope should include both cases of last mile deliveries.

3. FEA notes there might also be small packing or articles, which are also fully regulated such as CO₂ cylinders for sodas, gas bottles for grills, etc. They are then de-regulated in the case of 1.1.3.1 (a) and (c) but not in the above-mentioned last mile deliveries.

4. FEA wants to make crystal clear that it only seeks to address the challenges posed for last mile deliveries. FEA would oppose any proposal to deregulate complete journeys of dangerous goods from e-commerce when they are shipped multimodally or with an exchange of the transport medium.

Sustainability aspects

5. A pragmatic approach would allow for a reduction in packaging materials (less waste) and load weight (less fuel consumption), as well as encourage the deployment of smart reusable boxes (circular economy) to keep shipments safe. These actions will contribute to SDG 12 *Responsible Consumption and Production*, and SDG 13 *Climate Action*.

Way forward

6. Due to the complexity of the issue, FEA is of the opinion that an intersessional working group with the interested parties should be established to get insight from Canada, the United Kingdom and the USA who already have relevant provisions in place, provide more detailed explanations, and address remaining concerns.