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**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**

Bern, 20-24 March 2023

Item 5 (b) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:  
new proposals****Transport of packaged waste in combined packaging****Transmitted by the European Federation of Waste Management and  
Environmental Services (FEAD)\*,\*\****Summary*

**Executive summary:** This document considers the need to introduce a solution to carry waste in combined packaging where the existing rules are not sufficient to cover all the possible variations encountered in the waste management reality, in which often only the inner packagings are available, and a suitable outer packaging has to be added.

**Action to be taken:** Introduce a new 4.1.1.5.3.

**Introduction**

1. 4.1.1.5.1 foresees certain variations of inner packaging without further testing of the outer packaging.
2. 6.1.5.1.7 determines specific testing rules for outer packaging with variations of inner packagings.
3. Original products are packed in a combined packaging, specifically tested for that purpose (see RID/ADR 6.1.5). For waste collection, often only the inner packaging remains available (see pictures). This waste must be sorted, according to its hazardous properties, and be packed fulfilling all the requirements of RID/ADR.

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\* A/77/6 (Sect.20), para. 20.76

\*\* Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2023/20

4. The variations foreseen under 4.1.1.5.1 and even the provisions in 6.1.5.1.7 are too strict for the waste management as the existing variations of inner packaging are much wider as those foreseen under 4.1.1.5.1 or the packaging cannot be correctly used in accordance with the certification under 6.1.5.1.7. Also, for safety reasons it is not realistic to repack each single packaging containing waste. Hence, there is a lack of a simple legal solution available to replace the missing outer packaging.

5. In absence of applicable rules in RID/ADR, some countries have developed their national derogations to provide solutions for the waste management. Therefore, there is a need for harmonised rules that ensure a level playing field between countries and allow for international transports.

6. The following pictures show situations faced daily by the waste management sector:



Fig.1: unsorted waste offered for disposal



Fig. 2: university laboratory waste offered for disposal

## Proposal

7. Following discussions within the informal working group on the Transport of Hazardous Waste at the meeting held on 15 and 16 June 2022 in The Hague (and online), FEAD suggests adding a new 4.1.1.5.3:

“4.1.1.5.3 In the case of carriage of waste classified under 2.1.3.5.5, different inner packagings can be used together with one outer packaging, if the outer packaging used complies with the following provisions:

- (a) The outer packaging shall be tested for packaging group I;
- (b) An outer packaging tested for solids may be used for combined packaging, without specifically testing it for the inner packagings;
- (c) Inner packagings of different sizes and shapes and materials may be used, provided that the outer packaging used can be closed;

- (d) Sufficient cushioning material is used to prevent significant movement of the inner packagings under normal transport conditions;
- (e) Sufficient absorbent material is used so that any leakage of the contents of the inner packagings does not compromise the integrity of the cushioning material or of the outer packaging;
- (f) For packaging with codes 1H2, 3H2 and 4H2, proof of sufficient chemical compatibility is deemed to have been provided if the compatibility of the material with the respective standard liquids has been verified as part of a design test and approval for packaging with code 1H1 or 3H1;
- (g) Waste presenting a risk, or a subsidiary risk, of Class 5.1 shall not be packed together with waste classified under another class in the same outer packaging;
- (h) On the basis of the knowledge of the composition of the waste and the physical and chemical properties of the identified components, the waste contained in one outer packaging is assigned to the most stringent collective entry describing those properties, according to the table of precedence of hazards of 2.1.3.10.”

8. A new paragraph 5.4.1.1.xx has to be added:

“5.4.1.1.xx *Special provision for the transport of waste in combined packaging*

For carriage in accordance with 4.1.1.5.3, a statement shall be included in the transport document, as follows "Transport in accordance with 4.1.1.5.3".”

9. Other obligations under RID/ADR remain applicable, in particular 4.1.1.6. The proposal is based on the knowledge and practice acquired by the waste management sector in the past 20 years in different countries.



Fig. 3: example of sorted waste for disposal



Fig. 4: sorted waste (inner packaging in an outer packaging)

## Justification

10. This proposal clarifies the situation faced in waste management and does not increase the current risk level.

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