

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 (a) of the provisional agenda

13 March 2023

Proposals for amendments to RID/ADR/ADN:

Pending proposals

‘Last mile’ deliveries – Support and comments on document ECE/TRANS/WP.15/AC.1/2023/22 from COSTHA

Transmitted by the European Aerosol Federation (FEA)

Introduction

1. FEA would like to express its support for the concept presented in working document ECE/TRANS/WP.15/AC.1/2023/22 (COSTHA).

Comments

2. Due to limited storage capacities in the shops (point of sale) many so-called “Click & Collect” and “Click & Deliver” concepts are operated from a warehouse outside the urban areas. From there the goods are shipped directly to the final consumer or they are delivered to the local shop to be picked up on the next day. These transports are done together with the goods that are consolidated after a pick-and-pack operation for the tour to the point(s) of sale. With the same limits proposed in document ECE/TRANS/WP.15/AC.1/2023/22 these articles after pick-and-pack should also be excluded from the ADR, when they are in conformity with the new 1.1.3.1 (g).

3. 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.1/2023/22 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.

4. 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. The proposal made by COSTHA covers this and suggests a limit of 5kg/5L for single packagings. This value might be too low for single gas bottles. The standard size for consumer applications is a 10kg filling content.

5. FEA wants to make crystal clear that it only seeks to address the challenges posed by ‘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

6. 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*.

Proposal

7. Add to 1.1.3.1 (g) proposed in document ECE/TRANS/WP.15/AC.1/2023/22 the text “or which consigns the goods as a full load to the point of sale” to read as follows (new text in bold):

“(g) The carriage of dangerous goods by or on behalf of a consignor which consigns the goods directly to the final consumer (business to end consumer) **or which consigns the goods as a full load to the point of sale**, where the consignment is packaged for retail sale (online, in a brick-and-mortar storefront, through direct sales, or direct mail) is intended for the personal or domestic use of the final consignee (i.e., end consumer or recipient), if:”

8. Add in 1.1.3.1 (g), third indent, the text “For gas receptacles with liquified flammable gases for household use containing not more than [10 kg] gas” to read as follows:

“- The maximum quantity of dangerous goods contained in each packaging does not exceed 5 kilograms or litres. **For gas receptacles with liquified flammable gases for household use containing not more than [10 kilograms] gas;**

9. Add the words “or Packing Instruction P200” in the fifth indent after (iii) to read:

“iii. in single packagings conforming to Chapter 6.1 **or Packing Instruction P200;**
or”
