



Economic and Social Council

Distr.: General
4 July 2023

Original: English

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, 19-29 September 2023

Item 5 (a) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:
pending issues**

Chemical compatibility for plastics packaging containing liquid waste

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

Summary

Executive summary:	This document considers the need to introduce, presently non-existing, rules for plastics packagings of liquid waste when the exact composition of such waste is not known.
Action to be taken:	Introduce a new paragraph under 4.1.1.21.7.
Related documents:	ECE/TRANS/WP.15/AC.1/2023/19 Informal document INF.41 of the spring session 2023 of the Joint Meeting Report ECE/TRANS/WP.15/AC.1/168, paragraphs 47 and 48

Introduction

1. As determined by 4.1.1.21.1, for polyethylene packagings as specified in 6.1.5.2.6, and for polyethylene intermediate bulk containers (IBCs) as specified in 6.5.6.3.5, the chemical compatibility with filling substances may be verified by assimilation to standard liquids following the procedures, as set out in 4.1.1.21.3 to 4.1.1.21.5 and using the list in table 4.1.1.21.6, provided that the particular design types have been tested with these standard

* 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/2023/42.

liquids in accordance with 6.1.5 or 6.5.6, taking into account 6.1.6 and that the conditions in 4.1.1.21.2 are met.

2. When assimilation in accordance with this sub-section is not possible, the chemical compatibility needs to be verified by design type testing in accordance with 6.1.5.2.5 or by laboratory tests in accordance with 6.1.5.2.7 for packagings, and in accordance with 6.5.6.3.3 or 6.5.6.3.6 for IBCs, respectively.

3. The rule for collective entries (figure 4.1.1.21.2) requires the exact composition of the dangerous goods. In most cases, it leads to a declaration of "further testing required" because a lot of chemical compounds are not linked to a standard liquid. This is especially relevant for waste as the composition, in many cases, may not be exactly defined and could vary from day to day in function of the corresponding production process (e.g. liquid waste generated by laboratory analysis, used solvents generated by mechanical processes or cleaning activities, etc.).

4. "Further testing" means e.g. the dangerous goods has to be stored at room temperature for six months or on test pieces for three weeks under conditions. From a practical point of view, such process cannot be applied to each batch of generated waste, nor does it allow an efficient waste management.

Proposal

5. Following discussions within the informal working group on the transport of hazardous waste and at the Joint Meeting session of March 2023, FEAD suggests adding under 4.1.1.21.7 the following paragraph:

"In derogation of 4.1.1.21.1, liquid waste classified under 2.1.3.5.5 shall be filled into polyethylene packaging provided that the packagings have passed the tests with all standard liquids described in 6.1.6.1. Packagings shall conform to the packing group performance level as assigned by 2.1.3.5.5."

Justification

6. This proposal clarifies the situation faced in waste management and allows dangerous liquid waste with collective entries to be properly filled, not increasing the current risk level.
