

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

8 September 2023

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

Geneva, 19–27 September 2023

Item 5 (a) of the provisional agenda:

Pending issues

Updates to ECE/TRANS/WP.15/AC.1/2023/43 – Transport of waste in inner packagings packed together in an outer packaging – incorporating the comments put forward by the informal working group on waste

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

I Introduction

1. After publication of official document ECE/TRANS/WP.15/AC.1/2023/43, submitted by FEAD to the Joint Meeting on 23 June 2023, the competent authorities of Austria, France, Germany, Ireland, The Netherlands, Spain, and Switzerland, submitted comments within the Informal Working Group on the Transport of Hazardous Waste. These comments have been taken into account by FEAD in the updated version of the proposal included in this informal document for the examination of the Joint Meeting.

2. The updates aim mainly at the clarification and simplification of the proposal. It was also requested to clarify the scope limitation indicated in the proposal, which shall not be applicable to specific waste streams that have already been covered by Special Provisions elsewhere in RID/ADR. This is, for example, the case of Special Provision 650 for paint waste (UN1263), Special Provision 327 for waste of aerosols (UN1950) or gas cartridges (UN 2037), or Special Provision 670 for waste of lithium batteries or cells (UN 3090, 3091, 3480 and 3481).

II Updated proposal

A FEAD suggests adding a new 4.1.1.5.3. Changes in relation to the proposal submitted as ECE/TRANS/WP.15/AC.1/2023/43 are indicated here below using the “track changes” functionality.

"4.1.1.5.3 In the case of carriage of waste ~~from the collection point to the intermediate or treatment plant~~, inner packagings of different sizes and shapes, containing liquids or solids, can be packed together in one outer packaging, ~~if the following provisions are fulfilled provided that. These provisions do not apply to substances of class 1, 2, 6.2 and 7 and for waste covered by specific provisions already described elsewhere in RID/ADR:~~

(a) The waste carried is not covered by special provisions already described elsewhere in RID/ADR;

(b) The waste carried in each inner packaging is not classified as class 1, 2, 6.2, or 7;

- ~~(a)(c)~~ (c) On the basis of the knowledge of the composition of the waste and the physical and chemical properties of the identified components, ~~the content waste carried in~~ each inner packaging shall be identified is classified according to classification criteria of part 2, including 2.1.3.5.5, if needed;
- ~~(b)(d)~~ (d) ~~If the outer packaging is a packaging, it shall be tested for packaging group I; if the outer packaging is an IBC or a large packaging, it shall be tested for packaging group II;~~
- ~~(e)(e)~~ (e) The outer packaging shall be is one of the following:
- i. ~~packaging codes 1H2, 1A2, 3A13A2, 3H1, 3H2, 4A, 4H1 and 4H2 (including those tested under conditions of 6.1.5.1.7),~~
 - ii. IBC codes 11A, 11H1 and 11H2,
 - iii. large packaging codes 50A ~~and or~~ 50H;
- ~~(d)(f)~~ (f) ~~An~~ The outer packaging only is at least tested for solids ~~may be used~~;
- ~~(e)(g)~~ (g) The outer packaging is capable of retaining liquids under ~~the normal transport conditions of transport~~;
- ~~(f)(h)~~ (h) Sufficient cushioning material is used to prevent significant movement of the inner packagings under normal ~~transport conditions of transport~~;
- ~~(g)(i)~~ (i) ~~If a case of~~ the outer packaging is intended to contain breakable inner packagings classified as P under 6.1.2.6, or non-leak-proof inner packagings containing liquids, a means of recontaining any liquid contents ~~in the event of a leakage shall be~~ provided in order ~~not to~~ not compromise the integrity of the cushioning material or ~~of the outer packaging in the event of a leakage~~. Such means of ~~containment retention can~~ could be in the form of sufficient quantities of absorbent material and/or other equally efficient means of ~~containment retention~~;
- ~~(h)(j)~~ (j) For polyethylene outer packaging with codes 1H2, 3H2 and 4H2, proof of sufficient chemical compatibility is deemed to have been provided if the chemical compatibility of the material of the outer packaging with the standard liquids has been verified as part of a design type test and approval for packaging of the same material with code 1H1 or 3H1;
- ~~(i)(k)~~ (k) According to the waste identified in each inner packaging in accordance with ~~(ac)~~, inner packagings shall be packed together in an appropriate outer packaging only by trained and competent personnel in accordance with 1.3.2.2, with the use of ~~written~~ instructions or procedures, ensuring compliance with 4.1.1.6 and the provisions of mixed packing ~~provisions~~ of 4.1.10.4. The waste contained in one outer packaging shall be then assigned to the most appropriate ~~collective~~ entry. More than one entry can be used, if needed;
- ~~(j)(l)~~ (l) In derogation of 5.1.4, the only marking and labelling on the outer packaging is based on the collective entry given assigned to the outer packaging in accordance with ~~(ik)~~;
- ~~(k)~~ (k) ~~If the waste contained in the inner packaging is identified as a dangerous good for which an UN number is assigned to an MP2 code in column (9b) of table A in Chapter 3.2, it shall be packed in an outer packaging only with other inner packaging of the same UN number. The outer packaging is then marked and labelled according to this UN number."~~

1. A new paragraph 5.4.1.1.3.x has to be added:

"5.4.1.1.3.x *Special provisions for the transport of waste in inner packagings* packed together in an outer packaging

For carriage in accordance with 4.1.1.5.3, a statement shall be included in the transport document, as follows "Waste transported in accordance with 4.1.1.5.3". Additional statements prescribed given by 5.4.1.1.3.1 and 5.4.1.1.3.2 are not necessary.

For example:

“UN 1993, FLAMMABLE LIQUID, N.O.S., 3, III, (E); WASTE IN ACCORDANCE WITH 4.1.1.5.3”

~~In case of carriage according to 4.1.1.5.3 (i),~~ information in the transport document according to 5.4.1.1, ~~is shall be~~ based on the ~~collective~~-entry ~~given~~-assigned to the outer packaging in accordance with 4.1.1.5.3 (k). The technical name, as prescribed in Chapter 3.3, special provision 274, need not be added.”

~~For carriage in accordance with 4.1.1.5.3, a statement shall be included in the transport document, as follows: “Waste transported in accordance with 4.1.1.5.3”. Additional statement given by 5.4.1.1.3.1 and 5.4.1.1.3.2 are not necessary.”~~

2. The final text of the proposal, after implementation of the changes indicated above, reads as follows:

“4.1.1.5.3 In the case of carriage of waste, inner packagings of different sizes and shapes, containing liquids or solids, can be packed together in one outer packaging, provided that:

- (a) The waste carried is not covered by Special Provisions already described elsewhere in RID/ADR;
- (b) The waste carried in each inner packaging is not classified as class 1, 2, 6.2 or 7;
- (c) The waste carried in each inner packaging is classified according to classification criteria of part 2, including 2.1.3.5.5, if needed;
- (d) The outer packaging is tested for packaging group I;
- (e) The outer packaging is one of the following:
 - (i) 1H2, 1A2, 3A2, 3H1, 3H2, 4A, 4H2,
 - (ii) IBC code 11A, 11H1 and 11H2,
 - (iii) large packaging code 50A or 50H;
- (f) The outer packaging is at least tested for solids;
- (g) The outer packaging is capable of retaining liquids under normal conditions of transport;
- (h) Sufficient cushioning material is used to prevent significant movement of the inner packagings under normal conditions of transport;
 - (i) If the outer packaging contains inner packagings classified as P under 6.1.2.6, or non-leak-proof inner packagings, a means of retaining any liquid content is provided in order to not compromise the integrity of the cushioning material or the outer packaging in the event of a leakage. Such means of retainment could be in the form of sufficient quantities of absorbent material and/or other equally efficient means of retainment;
 - (j) For polyethylene outer packaging, proof of sufficient chemical compatibility is deemed to have been provided if the chemical compatibility of the material of the outer packaging with the standard liquids has been verified as part of a design type test and approval for packaging of the same material with code 1H1 or 3H1;
- (k) According to the waste identified in each inner packaging in accordance with (c), inner packagings are packed together in an appropriate outer packaging only by trained and competent personnel in accordance with 1.3.2.2, with the use of instructions or procedures, ensuring compliance with 4.1.1.6 and the provisions of mixed packing of 4.1.10.4. The waste contained in one outer packaging is then assigned to the most appropriate entry. More than one entry can be used, if needed;
- (l) In derogation of 5.1.4, the only marking and labelling on the outer packaging is based on the entry assigned to the outer packaging in accordance with (k).”

3. A new paragraph 5.4.1.1.3.x has to be added:

“5.4.1.1.3.x Special provision for the transport of waste in inner packagings packed together in an outer packaging

For carriage in accordance with 4.1.1.5.3, a statement shall be included in the transport document, as follows "Waste in accordance with 4.1.1.5.3". Additional statements prescribed by 5.4.1.1.3.1 and 5.4.1.1.3.2 are not necessary.

For example:

“UN 1993, FLAMMABLE LIQUID, N.O.S., 3, III, (E); WASTE IN ACCORDANCE WITH 4.1.1.5.3”

Information in the transport document according to 5.4.1.1, shall be based on the entry assigned to the outer packaging in accordance with 4.1.1.5.3 (k). The technical name, as prescribed in Chapter 3.3, special provision 274, need not be added.”
