
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

20 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 6 of the provisional agenda:

Interpretation of RID/ADR/ADN

Interpretation of UN 3509 in the case of the carriage of drums or IBC's

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

1. FEAD would like to ask the delegates on how they interpret the use of UN 3509, PACKAGINGS, DISCARDED, EMPTY, UNCLEANED in a specific case.
 2. UN 3509 can be used either for small packagings (jerricans, boxes, small drums) or for larger packagings (200 litres drums) or IBCs.
 3. “EMPTY PACKAGING”, or “EMPTY IBC” (5.4.1.1.6.2.1) are used only if the packaging, or the IBC is not damaged, and still covered by the certificate of approval.
 4. In the case of large drums (more than 200 litres) or IBC, if they are not covered anymore by the certificate of approval (adherent residues, corrosion, periodic control is outdated for IBC, ...), the only possibility for carriage is the use of UN 3509.
 5. They shall be transported, either in another packaging (packaging instruction P003, IBC08 or LP02) or in bulk (special provision for carriage in bulk VC1, VC2 and AP10). In the case we describe, bulk transport would be the only alternative because the large drums or the IBCs are too big to be packaged.
 6. However, in some cases, they are still compatible with a carriage as a package (and not in bulk), for example by putting the drums on a stretch-wrapped pallet, or because the only default of the IBC is to exceed the inspection deadline. Manutention and stowage are still possible as a package because they are still in a good shape to be transported like that.
 7. In those cases, loading or unloading in a bulk vehicle or container would generate more difficulties and risks.
 8. FEAD wanted to ask the delegates if transporting empty, uncleaned, discarded packagings as a package (and not only in bulk) could be considered.
-