

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

Information on the estimated quantity for waste transported in the transport document in accordance with 5.4.1.1.3.2

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

1. In document ECE/TRANS/WP.15/AC.1/2023/48, the Government of Ireland introduced an amendment to extend the scope of 5.4.1.1.3.2 to the quantity of medical and clinical waste (UN 3291).
 2. FEAD would like to take the opportunity of this document about paragraph 5.4.1.1.3.2 to have a discussion with the delegates about another restriction of the scope of this paragraph.
 3. Transport of waste in tanks other than vacuum-operated tanks has been excluded from the scope of 5.4.1.1.3.2.
 4. Since the introduction of paragraph 5.4.1.1.3.2 in ADR 2023, we have been informed by waste operators that in some cases, only an estimated quantity is available even for the transport in tanks other than vacuum operated tanks. This is the case, for example, when waste oils are collected in garages. In such cases, estimation can be easily made with the availability of the degree of filling.
 5. Paragraph 5.4.1.1.3.2 was introduced in ADR 2023 to take into account that for waste, in some cases, the quantity transported can only be estimated.
 6. In the first discussion, transport of waste in tanks other than vacuum-operated tank were not excluded (ECE/TRANS/WP.15/AC.1/2021/18 and informal document INF.26 (Spain) and INF.27 (FEAD) of the spring session of the Joint Meeting in Bern (15-19 March 2021).
 7. Initial justification was that for tanks, other than vacuum-tanks, enough information on the degree of filling shall be available to allow the estimation. For vacuum-operated tanks, the estimation shall be justified.
 8. In INF.42 (FEAD), document proposed during the Joint Meeting to take into account the current discussion, transport of waste in tanks other than vacuum-operated was excluded from the scope.
 9. FEAD wanted to ask the delegates if this limitation of the scope could be reconsidered to allow the indication of estimated waste quantities in the transport documents also for transports in tanks, other than vacuum-tanks.
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