Economic Commission for Europe
Inland Transport Committee
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 and INF.25 – 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)

Updated proposal

FEAD suggests adding a new 4.1.1.5.3. Changes in relation to the proposal submitted as INF.25 are indicated here below using the “track changes” functionality.

“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 in Chapter 3.3;

Alternative proposals from FEAD.

1. The waste carried is not covered by provisions described elsewhere in RID/ADR
2. Deleting the sentence because its obvious

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

    ;

   (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, or 4H2,
      (ii) 11A, 11H1 or 11H2,
      (iii) 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 with packaging code P under 6.1.2.6, or non-leak-proof inner packagings, the outer packaging shall have a means of retaining any free liquid that might escape from the inner packagings during carriage, e.g. absorbent material;
(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 all the standard liquids described in 6.1.6.1 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, 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. In particular, 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.

(l) The waste contained in one outer packaging is assigned to the most appropriate entry. More than one entry can be used, if needed. In derogation of 5.1.4, the only marking and labelling on the outer packaging is based on the entry or entries assigned to the outer packaging.

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 or entries 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.”