

ECONOMIC COMMISSION FOR EUROPE

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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, 22-26 March 2009

Item 9 of the agenda

ANY OTHER BUSINESS

Request for consultative status by the European Federation of
Waste Management and Environmental Services (FEAD)

Note by the secretariat

The secretariat has received from FEAD two draft proposals of amendments to RID/ADR intended to illustrate FEAD's interest for the activities of the Joint Meeting and that FEAD would like to be discussed at the Autumn session if consultative status is granted.

Should the Joint Meeting decide to grant consultative status to FEAD, it may also wish to provide preliminary comments on these draft proposals.



Fédération Européenne des Activités de la Dépollution et de l'Environnement
European Federation of Waste Management and Environmental Services
Europäische Föderation der Entsorgungswirtschaft

PROPOSAL FOR AMENDMENT TO ADR (Review 2011) FEAD proposal on packaging waste 24 February 2009

Solid waste consisting of mixed packaging

Introduction:

The waste management sector is daily involved with significant quantities of waste composed of damaged, not fit for re-use, over-dated packaging, large packaging and IBCs (intermediate bulk containers). These waste fractions consist of a wide variety of volumes (from some millilitres to up to three thousands liters) as well as various components (plastic, metal, glass, cardboard, composite, wood...). This waste is for disposal, energy recovery or material recycling; the purpose is therefore not to re-use the packaging.

These packaging do not correspond to 'empty packaging' as referred to in the ADR. The current ADR provisions are therefore not adapted to these packaging. Moreover exemptions foreseen for empty packaging (1.1.3.5. and 1.1.3.6.) cannot be applied to these packaging.

Considering the above and in order to avoid confusion, FEAD recommends using the terminology '*solid waste consisting of mixed packaging*', even if it is obvious that these packaging are technically empty.

This type of packaging waste is not always in its entirety or closed. It can be damaged, contaminated with external residues and also be labelled. It is practically not possible to organise transport of homogeneous packaging waste. In order to avoid dangerous reactions, stringent mixing rules have to be defined prior to the transport.

The best and safest way to transport and treat solid waste consisting of mixed packaging is in bulk containers. Current ADR provisions are not adapted to this practice and can therefore not be applied.

Proposal:

Add a definition under Chapter 1.2.1.

'*Solid waste consisting of mixed packaging*' is waste composed of damaged, not fit for re-use, over-dated packaging, large packaging and IBCs.

Add the following provision under 7.3.1.X :

Solid waste consisting of mixed packaging, belonging to classes 3, 4.1, 6.1, 8 and 9, packaging group II and III, can be transported according to the following provisions:

- a) The transport of solid waste consisting of mixed packaging is authorised under the condition that measures have been taken to avoid dangerous reactions.
- b) Classification according to 2.1.3.5.5 should apply.
- c) Bulk transport is allowed in transport units with cover, closed containers or containers with cover, all with complete walls. The floor of the container must be leakproof or rendered leakproof by means of a suitable and sufficiently stout inner lining.
- d) When the waste is transported in compliance with the above, the following has to be mentioned in the transport document: *waste in accordance with 2.1.3.5.5*
- e) Depending on the type of packaging involved, the following non exhaustive list of UN numbers can be selected, in accordance with 5.4.1.1.3:
 - o UN 3175 solid substances containing flammable liquids n.o.s., 4.1, II, packaging waste
 - o UN 3243 solid substances containing toxic liquids, n.o.s., 6.1, II, packaging waste
 - o UN 3244 solid substances containing corrosive liquids, n.o.s., 8, II, packaging waste
 - o UN 3077 Environmentally hazardous substance, solid, n.o.s., 9, III, packaging waste

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YYL, Finland

Justification:

Safety: Solid waste consisting of mixed packaging is not defined as such in the ADR guidelines; this proposal offers a guideline to manage the risk of this kind of waste when transported.

Waste management procedures already include measures to avoid dangerous reactions. Same safety procedures are applied to the mixing of packaging waste as for any other waste.

Feasibility: The waste management sector, municipalities (container parks) and SMEs are concerned by the proposed amendment. It is in line with the measures already taken to make the ADR more workable. No transitional period is required.

Enforceability: Monitoring can be ensured as all waste management companies have to be registered. Monitoring information is available at the licensed facilities.



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PROPOSAL FOR AMENDMENT TO ADR (Review 2011)
**FEAD proposal on soils and construction and demolition waste
contaminated with PCBs**
24 February 2009

Soils and construction and demolition waste contaminated with PCBs

Introduction:

In the context of soil sanitation and site remediation, some consignments may include solid waste contaminated with PCBs with concentrations higher than 1000 ppm.

The reference to VV15 was drafted in the past (2005) for the following UN-numbers : UN 2315 polychlorinated biphenyls, UN 3151 polychlorinated biphenyls liquid, UN 3151 polychlorinated terphenyl liquid, UN 3152 polychlorinated biphenyls solid, UN 3152 polychlorinated terphenyl solid as initially introduced in the multilateral agreement M 137.

UN 3432 is being used for contaminated soils and for construction & demolition waste. As contaminated soils and construction & demolition waste are always solid waste, UN 3432 should refer to VV10, which guarantees the same level of safety as VV15 without limiting it to 1000 ppm.

Proposal:

Inclusion of specific provision under UN 3432:

VV10 can be used instead of VV15 for solid contaminated soils and construction and demolition waste contaminated with PCBs.

Justification:

Safety: VV10 is as stringent as VV15. The reclassification in VV10 of this type of waste will avoid additional manipulation like packaging in bags, drums and will therefore limit contamination to other waste. This type of transport is more adapted this type of waste. There are no safety implications.

As PCBs are not volatile and as the waste is described as being solid, this specific provision has no additional negative impact on the environment.

Feasibility: The waste management and transport sectors, as well as the public sector (mandatory clean up operations) are concerned by the proposed amendment. It is a clear and applicable provision. It is controllable. It will avoid unnecessary manipulation/packaging for waste, which is preferably treated in bulk. No transitional period is required.

Enforceability: Enforceability can be observed and can be monitored by spot controls.

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