

## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

14 March 2012

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

Bern, 19–23 March 2012

Item 5(a) of the provisional agenda

#### Proposals for amendments to RID/ADR/ADN: pending issues

### Carriage of empty uncleaned packaging wastes – alternative proposal to 2012/9

#### Transmitted by the Government of United Kingdom

#### Introduction

1. The United Kingdom has doubts about the need for the new provisions relating to empty uncleaned packaging wastes which are proposed in 2012/9. However we recognise that a number of States do believe that there is a gap in the regulations for which they are seeking a solution. The United Kingdom is presenting the proposal below as an alternative to Option A in 2012/9. This proposal reduces the length of the special provision removing the need for a ‘definition’ and places the packaging requirements in the packing instructions rather than in the special provision.
2. Throughout the proposal the United Kingdom has avoided the use of the term ‘waste’ as its use could be confusing or have unforeseen consequences.

#### Proposal

3. In chapter 3.2, Table A add the following new entry:

(1)	(2)	(3a)	(3b)	(4)	(5)	(6)	(7a)	(7b)	(8)	(9a)	(9b)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
3xxx	EMPTY PACKAGING UN- CLEANED FOR DISPOSAL	9	M11		9	YYY	0	E0	P9XX IBC08 LP9XX			BK1 BK2					4 (E)		VV8/VW8 [Or VV1/VW1, VV2/VW2 AP 7*]			90

[\* This would be the bulk code assignment if the conclusions of the bulk container working group are adopted.]

4. Add a new special provision to chapter 3.3, to read as follows:

“YYY This entry only applies to empty packaging uncleaned, or parts thereof, which is carried for the purposes of recycling or disposal other than reconditioning or reuse, and which has been emptied to the extent that only residues stuck to its internal or external walls (or part of walls) are present when it is handed over for carriage.

This entry shall only be used for the carriage of empty packaging uncleaned or parts thereof with residues of hazard Classes 3, 4.1, 5.1, 6.1, 8 or 9 other than solids or liquids assigned to:

- a) Packing Group I or that have “0” assigned in Column (7a) of Table A of chapter 3.2;
- b) Desensitized explosive substances of Class 3 or 4.1, or;
- c) Self-reactive substances of Class 4.1

**NOTE 1** for exemptions relating to the carriage of empty uncleaned packagings, see 1.1.3.5 or 1.1.3.6.3

**NOTE 2** for provisions relating to the carriage of empty packagings, see 4.1.1.11”

- 5. Add a new packing instruction to section 4.1.4.1 as follows:

“

P9XX	PACKING INSTRUCTION	P9XX
This instruction applies to UN 3xxx		
Empty packaging uncleaned, or parts thereof, shall be packed in packagings meeting the provisions of <b>4.1.1.1, 4.1.1.2, 4.1.1.6, 4.1.1.8</b> and the relevant provisions of <b>4.1.3</b> and be so designed that they meet the construction requirements of 6.1.4.		
<b>Additional requirements:</b>		
Empty packaging uncleaned, or parts thereof, having contained a risk [or sub-risk] of Class 5.1 shall not be mixed with other empty packaging uncleaned of any other Class of hazard.		

“

- 6. Add a special packing provision to IBC packing instruction IBC08 in section 4.1.4.2 as follows:

“

IBC08	PACKING INSTRUCTION	IBC08
Special packing provisions:		
Bxx For UN 3xxx empty packaging uncleaned, or parts thereof, having contained a risk [or sub-risk] of Class 5.1 shall not be mixed with other empty packaging uncleaned of any other Class of hazard. The testing requirements of 6.5 are not required.		

“

7. Add a new large packing instruction in 4.1.4.3 as follows:

“

LP9XX	PACKING INSTRUCTION	LP9XX
This instruction applies to UN 3xxx		
Large packagings are authorized provided the general provisions of <b>4.1.1.1, 4.1.1.2, 4.1.1.6, 4.1.1.8</b> and <b>4.1.3</b> are met and shall be so designed that they meet the construction requirements of 6.6.4.		
<p><b>Additional requirements:</b>            Empty packaging uncleaned, or parts thereof, having contained a risk [or sub-risk] of Class 5.1 shall not be mixed with other empty packaging uncleaned of any other Class of hazard.</p>		

“

8. Add a new title and paragraph to 5.4.1.1.7 as follows (renumber existing paragraph 5.4.1.1.7 as 5.4.1.1.8):

“5.4.1.1.7 Special provision for empty packaging uncleaned for disposal

5.4.1.1.7.1 For the carriage of UN 3xxx Empty Packaging Uncleaned for Disposal the sequence mentioned in 5.4.1.1.1 shall be complemented with the words ‘having contained’ followed by the Class(es) of hazard or sub-hazard corresponding to the residues. For example, a combination of packagings or parts thereof having contained a combination of primary hazard Classes 4.1 or 6.1 together with substances with a subsidiary hazard of Class 3 or 8 shall be referred in the transport document as:

‘UN3xxx Empty packaging uncleaned for disposal, 9, having contained 3, 4.1, 6.1, 8’.”