

## Economic Commission for Europe

### 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

21 February 2023

Bern, 20-24 March 2023

Item 4 of the provisional agenda

Interpretation of RID/ADR/ADN

## Carriage in bulk of empty packages, uncleaned, having contained dangerous goods

Transmitted by the Government of France

### Introduction

1. The Government of France has been made aware of an issue related to bulk carriage provisions in chapter 7.3.
2. The last paragraph of 7.3.1.1 reads “Empty packages, uncleaned, may be carried in bulk if this mode of carriage is not explicitly prohibited by other provisions of ADR”.
3. In accordance with the provision of 1.1.3.6.3, empty uncleaned packages may be carried under transport category 4 (unlimited). According to the exemption under 1.1.3.6.2 the orange plates or placarding are not mandatory.
4. In RID/ADR/ADN there are no provisions prohibiting the carriage of empty or filled packages in vehicles/containers for carriage in bulk, and on some occasions such use can be encountered during road side checks.
5. However, in accordance with 5.3.1.4 of RID/ADR/ADN, vehicles and containers for the carriage in bulk should have a placard affixed. Following the provisions in 5.3.2.1.4 orange plates should also be affixed.
6. France believes that there is some unclarity between 7.3.1.1 and 1.1.3.6 category 4 for empty packaging.
7. Furthermore, except from the text in 7.3.1.1 there is no other precision in chapter 7.3 on provisions for transport in bulk applicable to such loads.

### Questions

8. France would like to submit the following interpretation questions for consideration by the Joint Meeting:

**Question 1:** In what type of vehicles or containers such empty packages carried in bulk according to 7.3.1.1 should be carried, and what instruction would apply: VC1, VC2, BK1, BK2 or BK3?

**Question 2:** In the case of different packages having contained materials of different classes, what are the rules for the placarding and the orange-coloured plate marking applicable to bulk transport carried out according to the last paragraph of 7.3.1.1?

**Question 3:** How is it possible to distinguish during a roadside check a transport of empty packaging in a vehicle or container for transport in bulk under the regime of 1.1.3.6 (transport category 4) from a transport carried out according to the provisions of the last paragraph of 7.3.1.1? Did any other authorities experienced such issues during a check? And how would it be considered?