

## 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

Bern, 20-24 March 2023

Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN:

new proposals

13 March 2023

### **Proposed amendments to ADR 5.4.1.1.3.2 regarding information in the transport document on the quantity transported**

#### **Transmitted by the Government of Ireland**

#### **Introduction**

1. Ireland welcomed the introduction of new provision 5.4.1.1.3.2 when it was included in the 2023 edition of the ADR. Since its introduction, however, it has emerged that there is a particular activity in the area of waste management that is not permitted by the provisions as they currently stand.
2. We have received an application for a national exemption to permit the carriage within a container (cage) of clinical and medical waste (UN No. 3291) already packaged in accordance with ADR 4.1.4.1, P621, without the inclusion of the number of the packages in the transport document. It is proposed in the application to 'estimate' the quantity of the clinical/medical waste in the container (cage) using the nominal volume/capacity of the container (cage).
3. The container (cage) in this instance is fulfilling the role of an overpack, as the already packaged waste (according to P621) is consolidated into a single unit (container (cage)) that is easier to handle and stow during carriage.
4. Ireland proposes amendments to 5.4.1.1.3.2, as provided in paragraph 9 below, taking into consideration the justification provided in paragraphs 5 to 8.

#### **Justification**

5. It is suggested to add the phrase 'without disproportionate cost or effort' to the first paragraph of 5.4.1.1.3.2. For clinical or medical waste (UN 3291) for example, healthcare staff collect these UN approved packagings from the site and place them into a container (cage) awaiting collection by the waste carrier. If the carrier drivers are required to count each individual packaging, then they would need to remove all packagings from the container (cage) and count each individual type and quantity before noting on the ADR transport document. With many hospital collections in a day, this substantially decreases efficiency of collection, and increases the risk to the drivers who need to move the packaging in and out of the container (cage) during the counting process.
6. It is suggested to include overpacks in 5.4.1.1.3.2 (b) to increase the scope of the containment of the waste under this provision.
7. Ireland understands that waste containing substances mentioned in 2.1.3.5.3 is specifically excluded from the provisions of 5.4.1.1.3.2. However, it is suggested that it would be of benefit to consignors and carriers of medical or clinical waste (UN 3291) if this

exclusion does not include waste belonging to Class 6.2 that is already packaged in conformance with ADR 4.1.4.1, P621. It is considered that the waste as packaged does not present the same degree of risk as the other substances listed in 2.1.3.5.3.

8. To note, this proposal does not apply to medical and clinical waste (UN 3291) that is carried in larger outer packaging (for example, wheelie bins) of various capacities, as there is no difficulty with providing the number of these outer packagings in the transport document in accordance with 5.4.1.1.1(e). This proposal is only concerned with the estimation in the transport document, of the weight/volume of the smaller ‘sharps bins’ meeting the requirements of P621, that are carried in the containers (cages) as part of the consignment.

## Proposal

9. Proposed amendments to 5.4.1.1.3.2 as follows (new text in bold and underlined):

“If it is not possible **without disproportionate cost or effort** to measure the exact quantity of the waste at the place of loading, the quantity according to 5.4.1.1.1 (f) may be estimated for the following cases under the following conditions:

- (a) For packagings, a list of packagings including the type and the nominal volume is added to the transport document;
- (b) For **overpacks or** containers, the estimation will be based on their nominal volume and other available information (e.g. type of waste, average density, degree of filling);
- (c) For vacuum operated waste tanks, the estimation shall be justified (e.g. by means of an estimation provided by the consigner or by wagon/vehicle equipment).

Such estimation of the quantity is not allowed for:

- Exemptions for which the exact quantity is essential (e.g. 1.1.3.6);
- Waste containing substances mentioned in 2.1.3.5.3 (**with the exception of UN No. 3291, medical or clinical waste, in packaging conforming to P621**) or substances of Class 4.3;
- Tanks other than vacuum operated waste tanks.

A statement shall be included in the transport document, as follows:

“QUANTITY ESTIMATED IN ACCORDANCE WITH 5.4.1.1.3.2”.

## Request

10. The Irish delegation would be interested to hear the opinions of other delegations in relation to the above proposal.

11. If agreed in principle, and taking all comments into consideration, Ireland will be prepared to submit a formal document for the next session.

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