



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**

Geneva, 19-29 September 2023

Item 5 (a) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:
pending proposals****Transport of waste in inner packagings packed together in an
outer packaging****Transmitted by the European Federation of Waste Management and
Environmental Services (FEAD)*, *****Summary*

Executive summary: This document considers the need to introduce a solution to carry waste in inner packagings packed together in an outer packaging where the existing combination packaging rules are not sufficient to cover all the possible variations encountered in the waste management reality, in which often only the inner packagings are available, and a suitable outer packaging has to be added.

Action to be taken: Introduce a new 4.1.1.5.3.

Related documents: ECE/TRANS/WP.15/AC.1/2023/20

Report ECE/TRANS/WP.15/AC.1/168, paragraph 48

Introduction

1. 4.1.1.5.1 foresees certain variations of inner packaging without further testing of the outer packaging.

* A/77/6 (Sect.20), para. 20.76

** Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2023/43

2. 6.1.5.1.7 determines specific testing rules for outer packaging with variations of inner packagings.
3. Original products are packed in a combination packaging, specifically tested for that purpose (see RID/ADR 6.1.5). For waste collection, often only the inner packaging remains available (see pictures). This waste must be sorted, according to its hazardous properties, and be packed fulfilling all the requirements of RID/ADR.
4. The variations foreseen under 4.1.1.5.1 and even the provisions in 6.1.5.1.7 are too strict for the waste management as the existing variations of inner packaging are much wider as those foreseen under 4.1.1.5.1 or the packaging cannot be correctly used in accordance with the certification under 6.1.5.1.7. Also, for safety reasons it is not realistic to repack each single packaging containing waste. Hence, there is a lack of a simple legal solution available to replace the missing outer packaging.
5. In absence of applicable rules in RID/ADR, some countries have developed their national derogations to provide solutions for the waste management. Therefore, there is a need for harmonised rules that ensure a level playing field between countries and allow for international transports.
6. The following pictures show situations faced daily by the waste management sector:

Figure 1: Unsorted waste offered for disposal



Figure 2: University laboratory waste offered for disposal



Proposal

7. Following discussions during the March 2023 Joint Meeting in Bern, and within the informal working group on the transport of hazardous waste at the online meeting held on 30 May 2023, FEAD suggests adding a new paragraph 4.1.1.5.3:

"4.1.1.5.3 In the case of carriage of waste from the collection point to the intermediate or treatment plant, inner packagings of different sizes and shapes, containing liquid or solid, can be packed together in one outer packaging, if the following provisions are fulfilled. These provisions do not apply to substances of class 1, 2, 6.2 and 7 and for waste covered by specific provisions already described elsewhere in RID/ADR:

(a) On the basis of the knowledge of the composition of the waste and the physical and chemical properties of the identified components, the content of each inner packaging shall be identified according to classification criteria of part 2, including 2.1.3.5.5 if needed;

(b) If the outer packaging is a packaging, it shall be tested for packaging group I; if the outer packaging is an IBC or a large packaging, it shall be tested for packaging group II;

(c) The outer packaging shall be one of the following:

(i) packaging codes 1H2, 1A2, 3A1, 3H2, 4A, 4H1 and 4H2 (including those tested under conditions of 6.1.5.1.7),

(ii) IBC codes 11A, 11H1 and 11H2,

(iii) large packaging codes 50A and 50H;

(d) An outer packaging only tested for solids may be used;

(e) The outer packaging is capable of retaining liquids under the normal transport conditions;

(f) Sufficient cushioning material is used to prevent significant movement of the inner packagings under normal transport conditions;

(g) In case of the outer packaging is intended to contain breakable inner packagings containing liquids, a means of containing any liquid contents in the event of a leakage shall be provided in order not to compromise the integrity of the cushioning material or of the outer packaging. Such means of containment can be in the form of sufficient quantities of absorbent material and/or other equally efficient means of containment;

(h) For packaging with codes 1H2, 3H2 and 4H2, proof of sufficient chemical compatibility is deemed to have been provided if the compatibility of the material with the standard liquids has been verified as part of a design test and approval for packaging of the same material with code 1H1 or 3H1;

(i) According to the waste identified in each inner packaging in accordance with (a), inner packagings shall be packed together in an appropriate outer packaging only by trained and competent personnel, with the use of written instructions or procedures, ensuring compliance with 4.1.1.6 and the mixed packing provisions of 4.1.10.4. The waste contained in one outer packaging shall be then assigned to the most appropriate collective entry;

(j) In derogation of 5.1.4, the only marking and labelling on the outer packaging is based the collective entry given to the outer packaging in accordance with (i);

(k) 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."

8. A new paragraph 5.4.1.1.3.x has to be added:

"5.4.1.1.3.x *Special provisions for the transport of waste in inner packaging packed together in an outer packaging*

In case of carriage according to 4.1.1.5.3 (i), information in the transport document, according to 5.4.1.1, is based on the collective entry given to the outer packaging. The technical name, as prescribed in Chapter 3.3, special provision 274, need not be added.

For carriage in accordance with 4.1.1.5.3, a statement shall be included in the transport document, as follows "Waste transported in accordance with 4.1.1.5.3". Additional statement given by 5.4.1.1.3.1 and 5.4.1.1.3.2 are not necessary."

9. Other obligations under RID/ADR remain applicable. The proposal is based on the knowledge and practice acquired by the waste management sector in the past 20 years in different countries.

Figure 3: Example of sorted waste for disposal



Figure 4: Sorted waste (inner packaging in an outer packaging)



Justification

10. This proposal clarifies the situation faced in waste management and does not increase the current risk level.