



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****Information on the quantity transported in the transport
document in accordance with 5.4.1.1.3.2****Transmitted by the Government of Ireland*, *****Summary*

Executive summary:	Proposed amendment of 5.4.1.1.3.2 to provide for the estimation of the quantity of medical and clinical waste (UN 3291) already packaged in compliance with packing instruction P621.
Decision to be taken:	Amendment of 5.4.1.1.3.2.
Related documents:	Informal document INF.30 of spring session of the Joint Meeting, held on 20-24 March 2023; Report ECE/TRANS/WP.15/AC.1/168, paragraph 45.

Introduction

1. Ireland welcomed the introduction of new provision 5.4.1.1.3.2 when it was included in the 2023 edition of RID/ADR/ADN. 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. Ireland has 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 4.1.4.1, packing instruction P621, without the inclusion of the number of the packages (sharps bins) in the transport document. It is proposed in the application to

* A/77/6 (Sect. 20), table 20.6.

** Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2023/48.

‘estimate’ the quantity of the clinical/medical waste in the container using the nominal volume/capacity of the container.

3. Ireland proposes amendments to 5.4.1.1.3.2, as provided in paragraphs 4 below.

Proposal

4. Proposed amendments to 5.4.1.1.3.2 are marked in bold and underlined:

“5.4.1.1.3.2 If it is not possible 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 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 3291, clinical waste, unspecified, n.o.s. or (bio)medical waste, n.o.s. or regulated medical waste, n.o.s. in packaging conforming to packing instruction 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".”

Justification

5. 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. It would be of benefit to consignors and carriers of medical or clinical waste (UN No. 3291) if this exclusion does not include waste belonging to Class 6.2 that is already packaged in conformance with RID/ADR 4.1.4.1, packing instruction 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.

6. To note, this proposal does not apply to medical and clinical waste (UN No. 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 mass/volume of the smaller "sharps bins" meeting the requirements of packing instruction P621, that are carried in containers (cages) as part of the consignment.