



Economic and Social Council

Distr.: General
10 July 2023
English
Original: French

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 issues

Carriage in bulk of empty packagings, uncleaned, according to 7.3.1.1

Transmitted by the Government of France*, **

Summary

Executive summary:	The purpose of this document is to clarify the provisions applicable to the carriage in bulk of empty packagings, uncleaned, according to RID/ADR 7.3.1.1.
Action to be taken:	Amend the heading of 7.3.1.1.
Related documents:	ECE/TRANS/WP.15/AC.1/168, para. 16 Informal document INF.19 of the 2023 spring session of the RID/ADR/ADN Joint Meeting

Introduction

1. Following the March 2023 session of the Joint Meeting and informal document INF.19 considered at that session, France proposes to make an amendment to 7.3.1.1 concerning the possibility of transporting empty uncleaned packagings in bulk.

2. The last paragraph of 7.3.1.1 reads “Empty packagings, uncleaned, may be carried in bulk if this mode of carriage is not explicitly prohibited by other provisions of RID/ADR”. Chapter 7.3 gives no further explanation of the type of equipment that may be used for such carriage, nor of any precautions that might need to be taken.

* 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/2023/49.



3. RID/ADR already offers several options for transporting empty uncleaned packagings. It is thus possible to transport them under the exemption regimes set out in 1.1.3.5 or 1.1.3.6.
4. UN 3509 (DISCARDED, EMPTY, UNCLEANED, Class 9) is authorized for carriage in bulk, subject to compliance with VC1, VC2 and AP11 of Chapter 7.3.
5. Hence, it would seem that the last paragraph of 7.3.1.1 creates confusion by creating another option for carriage in bulk without specifying the applicable rules, thus opening up the possibility of transporting in bulk empty uncleaned packagings having contained substances assigned to transport category “0” or substances prohibited in the provisions applicable to UN 3509 (empty uncleaned packagings having contained goods of Class 6.1 or Class 1, for example).
6. France therefore proposes deleting the last paragraph of 7.3.1.1.

Proposal

7. In 7.3.1.1, delete the following paragraph:
“Empty packagings, uncleaned, may be carried in bulk if this mode of carriage is not explicitly prohibited by other provisions of RID/ADR.”

Justification

8. The amendment clarifies the regulatory provisions and thus avoids possible confusion as to the transport regime applicable to the dangerous goods being transported.
-