

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

1 September 2023

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

Geneva, 19–27 September 2023

Item 5 (a) of the provisional agenda:

**Proposals for amendments to RID/ADR/ADN:
pending issues**

‘Last mile’ deliveries – Support to and comments on document ECE/TRANS/WP.15/AC.1/2023/47 from COSTHA

Transmitted by the European Aerosol Federation (FEA)

Introduction

1. FEA would like to express its support for the concept presented in document ECE/TRANS/WP.15/AC.1/2023/47 (COSTHA).
2. FEA wants again to make clear that it only seeks to address the challenges posed by ‘last mile’ deliveries. FEA would oppose any proposal to deregulate complete journeys of dangerous goods from e-commerce when they are shipped multimodally or with an exchange of the transport medium.
3. Due to limited storage capacities in the shops (point of sale) many so called “Click & Collect” and “Click & Deliver” concepts are operated from a warehouse outside the urban areas. From there the goods are shipped directly to the final consumer or they are delivered to the local shop to be picked up the next day. These transports are done together with the goods that are consolidated after a pick & pack operation for the tour to the point(s) of sale.
4. With the same limits proposed in document ECE/TRANS/WP.15/AC.1/2023/47 these articles after pick & pack should also be excluded from the ADR, when they are in conformity with the new proposed 1.1.3.1 (g).

Justification

5. The practical challenges posed by the transport after pick-and-pack from a local distribution warehouse or a shop to a final user, explained in document ECE/TRANS/WP.15/AC.1/2023/47 are in fact identical to those after pick-and-pack from a local distribution warehouse to a point of sale, which could for example be a shop, drugstore or pharmacy. In both cases the inner packagings or articles are originally in outer packagings conforming with the limited quantity chapter or with fully declared goods then in combination packagings. Consequently, FEA considers that the scope should include both cases of ‘last mile’ deliveries.

Sustainability aspects

6. A pragmatic approach would allow for a reduction in packaging materials (less waste) and load weight (less fuel consumption), as well as encourage the deployment of smart reusable boxes (circular economy) to keep shipments safe. These actions will contribute to Sustainable Development Goals 12 *Responsible Consumption and Production* and 13 *Climate Action*.

Note

7. FEA has noted that Hungary has implemented such a national derogation for the distribution of goods in inner packagings to retailers or from local distribution depots to retailers or users and from retailers to end-users.

Proposal

8. It is proposed to amend the first paragraph of 1.1.3.1 (g) in document ECE/TRANS/WP.15/AC.1/2023/47 to as follows (*new text is shown in bold; deleted text is crossed-out*):

“(g) the carriage of dangerous goods by or on behalf of a consignor which consigns the goods directly to the final consumer ~~(business to end consumer)~~ **or as full load* to the point of sale**, where the consignment is packaged for retail sale (online, in a brick-and-mortar storefront, through direct sales, or direct mail) and intended for the personal or domestic use of the consignee ~~(i.e. end consumer or recipient)~~, if:”

* Remark: according to the definition of a “full load” in ADR para 1.2.1. It means *any load originating from one consignor for which the use of a vehicle ... is exclusively reserved and all operations for the loading and unloading of which are carried out in conformity with the instructions of the consignor or of the consignee.*
