

## **Report on the First Meeting of the Joint Meeting's Working Group on the Transport of Dangerous Wastes (Bonn, 15 and 16 November 2005)**

1. On the invitation of the Federal Ministry of Transport, Building and Housing (BMVBW), the first meeting of the Joint Meeting's Working Group on the Transport of Dangerous Wastes was held in Bonn on 15 and 16 November 2005.
2. The following states took part in the consultations held during this meeting: Austria, Belgium, Croatia, France, Germany, Hungary, Poland, Romania, Switzerland and the United Kingdom. The European Federation of Waste Management and Environmental Services (FEAD) and the Intergovernmental Organisation for International Carriage by Rail (OTIF) were also represented. A detailed list of participants is enclosed.

### **Welcome and agenda**

3. Mr Rein (BMVBW) welcomes the participants, explains the purpose of this working group and presents the time schedule as well as the agenda.
4. The representative of Austria proposes that document OCTI/RID/GT-III/2005/26 (TRANS/WP.15/AC.1/2005/26) of the Joint Meeting should not be discussed again since this document was already discussed in detail at the second last Joint Meeting. The current discussion should only focus on Multilateral Agreement M 172 (for ADR) or Multilateral Special Agreement RID 5/2005 (for RID). The agenda was changed accordingly and adopted.

### **Chairmanship of the working group meeting**

5. Mr Rein proposes to charge Mr Döring (Federal Institute for Materials Research and Testing) with the chairmanship of the working group. This proposal is accepted by the working group.

### **Agenda item 1: Compilation of the RID/ADR regulations concerning the transport of dangerous wastes**

6. The chairman presents document INF. B1 which contains a compilation of the RID/ADR regulations concerning the transport of dangerous wastes.
7. The representative of Switzerland points out that, as of 1 January 2007, provisions on the transport of waste aerosols will be included in RID/ADR (SP 327).
8. The representative of France points out that RID/ADR also contains provisions on the transport of used lithium batteries or lithium batteries contained in equipment (SP 636 and packing instruction P903b).
9. The representative of Austria welcomes document INF. B1. He explains that the dangerous goods legislation includes various regulations on the transport of dangerous wastes. In his opinion, however, the regulations made so far are incomplete and a continuous thread is not yet clearly visible. He also explains that as far as wastes are concerned, two different legal systems, i.e. dangerous goods legislation and waste management legislation, collide, and therefore different definitions which only partly correspond to each other are used for the same expression. The wastes listed by name in RID/ADR represent an ideal case and there is no need to take them into further consideration. He proposes to establish a link with waste management legislation in

the definition of wastes under section 1.2.1.

10. The chairman says that in the English version of document INF. B1 he explicitly made a distinction between the term “dangerous wastes”, as used in RID/ADR, and the term “hazardous wastes”, as used in waste management legislation or in the Basle Convention. In the German version, the term “gefährliche Abfälle“ is used in both cases.
11. The representative of France explains that in the case of some dangerous wastes, transport in compliance with all provisions of RID/ADR is not possible and proposes that the individual requirements with regard to classification, packaging, marking, the transport document etc. be considered one after another so that regulations can be worked out in cases where regulations for the transport of dangerous wastes do not exist but are necessary.
12. The representative of Belgium draws attention to the fact that RID/ADR contains regulations for the transport of dangerous wastes as described in document INF. B1. He draws particular attention to the fact that there are regulations for the carriage in bulk of certain dangerous wastes, which, however, may not be applied to similar substances if they are not carried as wastes. Exemptions should be limited to cases in which they are really necessary and should not adversely affect transport safety.
13. The representative of Germany notes that it was important to the working group to present document INF. B1 at the beginning and to discuss it since it shows the current philosophy of RID/ADR. He explains that a modification of the system is not desired and that the approach proposed by the representative of France is a possibility for discussing the individual points on the basis of the current set of regulations. He proposes, as a first step, to take a closer look at the individual systems in the different states. With regard to the subsequent development of regulations for the transport of dangerous wastes he asks the participants not to forget the economic aspects on the one hand and to make sure on the other hand that there is sufficient supervision; in this way, it can be prevented that the potential reduction in transport safety creates a risk.

**Agenda item 2: Presentation of different systems for the transport of dangerous wastes used in the RID/ADR Member States**

14. The representative of Austria comments on the system applied in Austria as follows:
  - In Austria, individual national exemptions are made, e.g. for the restoration of landfill sites, in order to speed up the restoration process; as a rule, RID/ADR is not complied with in this context.
  - The purpose of Multilateral Agreement M 172 (ADR) and Multilateral Special Agreement RID 5/2005 (RID) is also to limit the grant of individual national exemptions in Austria.
15. The chairman presents the German exemption no. 20 of the Dangerous Goods Exemption Ordinance (GGAV) and makes the following comments:
  - The original purpose of exemption no. 20 of the Dangerous Goods Exemption Ordinance was the transport of hazardous household wastes under the responsibility of the relevant local authority by means of so-called “HazMobiles” (Household Hazardous Waste Collection Vehicles). These HazMobiles are staffed by specifically trained people who are capable of classifying on the spot the substances to be transported.
  - In the past, the transport of certain substances, e.g. substances of packing group I, was not permitted under the terms and conditions of this exemption.

- The individual waste groups were assigned such substances which in the view of the experts cannot lead to a dangerous reaction when released or mixed up.
  - Through subsequent extension to cover, for example, substances of packing group I, it also became applicable to the transport of dangerous industrial waste. However, substances which, in accordance with RID/ADR, are not accepted for carriage or only accepted for carriage under specific conditions, may still not be carried under this exemption.
  - Exemption no. 20 is based on so-called waste groups. For the description of the waste groups the general n.o.s. entries or collective entries were used.
  - In exemption no. 20, the regulations on the delivery receptacles, the packagings to be used, the requirements with regard to the packagings etc. can be found after the waste groups.
16. A FEAD representative says in relation to the chairman's comments that the application of exemption no. 20 of the Dangerous Goods Exemption Ordinance has not caused any problems so far. He stresses how important the exemption is to the waste disposal industry, not only with regard to the transport of hazardous household waste but also with regard to small quantities from the industry such as laboratory chemicals, and explains that the instructions in writing which are used as transport documents in the framework of this exemption have proved to be useful.
17. Thereafter, the chairman explains the approach to be pursued in the case of substances of waste group 15, i.e. substances which cannot be classified. According to this approach, the delivery receptacles of unidentifiable substances must be placed in a wooden box of code 4C1, 4C2, 4D or 4F, a fibreboard box of code 4G, a solid plastics box of code 4H2, plastics film bags of code 5H4 or plastics drums of code 1H2, which shall at least be type-tested, type-approved and marked in accordance with packing group II; the empty space must be filled with inert absorbent and filling materials. Such boxes, bags or drums shall then be packed individually or in groups in steel, aluminium or solid plastics boxes of code 4A, 4B, 4H2 or in steel or plastics drums of code 1A2, 1H2, which are type-tested, type-approved and marked accordingly. It is therefore a triple packaging (the delivery receptacle is inserted in a type-tested packaging of packing group II and this double packaging is again inserted in another type-tested packaging). He points out that exemption no. 20 also provides for a quantity limit of 60 litres or 60 kg with regard to the relevant delivery receptacles.
18. A FEAD representative explains in relation to exemption no. 20 that the qualified supervising personnel have small aids such as pH papers, oil test paper etc. and in most cases try to assign the substance concerned to the corresponding waste group so that waste group 15 is rarely used in practice. Moreover, he explains that compliance with the provisions of RID/ADR is not always possible, e.g. if the delivery receptacles are damaged. By means of exemption no. 20, such delivery receptacles may also be carried under certain conditions.
19. The representative of Austria asks whether there is any publication in Germany in which the UN numbers have been juxtaposed with the waste codes. This is affirmed by the representative of Germany who mentions a private publication.
20. In his presentation, the representative of Switzerland then outlines the system used in his country and makes the following comments:
- In comparison with exemption no. 20 in Germany, legislation is rudimentary in Switzerland and only covers the transport of household wastes.
  - For industry and trade there are separate systems of waste disposal and declaration which are prescribed by environmental legislation.

- Exemptions are made for household wastes with regard to the prescribed packagings, mixed packing, labelling and marking. Classification is made by an expert in accordance with a simplified procedure and a note is entered in the transport document indicating that the transport operation is carried out under an exemption.
  - As regards household wastes that cannot be identified, a limit of 50 kg per packaging and 300 kg per package applies and the outer packaging must be tested and approved in accordance with the requirements for packing group II. Apart from a relevant entry in the transport document, no further requirements have to be observed for the transport of such wastes.
21. The representative of the United Kingdom comments on the system applied in her country as follows:
- In the United Kingdom the responsibility for the interpretation and development of dangerous goods regulations is with the Department for Transport with the exception of Class 1 goods which are the preserve of the Health and Safety Executive. The Environment Agency is responsible for the waste regulations. In order to avoid different interpretations by the ministries concerned, no exemptions from RID/ADR are made for the transport of hazardous wastes; however, at the same time industry does not make any demands for special provisions governing the transport of hazardous wastes.
  - However, problems with compliance may arise if the consignor cannot be identified or if the information contained in the transport document is incomplete.
  - It is possible that, for example in the case of transport operations between the United Kingdom and Ireland, compliance with the provisions of the IMDG Code is required.
  - The regulations for the transport of household wastes are made by the local authorities but in this case no exemptions are made from RID/ADR either.
22. The representative of France comments on the system applied in France as follows:
- In France, as in the United Kingdom, there are no exemptions from the provisions of RID/ADR on the transport of dangerous wastes either.
  - As a rule, n.o.s. entries are made in the transport document whereas the technical name required by RID/ADR is not mentioned.
  - However, compliance with the provisions of RID/ADR is not always possible, e.g. if the required packaging is not available on the market.
23. The representative of Poland comments on the system applied in Poland as follows:
- In Poland, as in the United Kingdom, there are no exemptions from the provisions of RID/ADR on the transport of dangerous wastes either.
  - Offences are punishable by a fine; the initial fine, however, is rather small so that the companies choose to pay a fine rather than comply with the provisions.
24. The representative of Belgium comments on the system applied in Belgium as follows:
- On the one hand, there are a few exemptions for the transport of large quantities of substances of packing group III in special containers which, however, only apply to a negligible number of substances.
  - On the other hand, there are one-time exemptions for carriage to the nearest location where the dangerous waste carried can be treated.
  - For the transport of dangerous wastes from private households and small enterprises (up to five employees), the wastes are collected every month by means of "HazMobiles" that are staffed by dangerous goods experts who are responsible for the classification of the wastes. For substances that cannot be identified, plastics drums of packing group II are used as packaging. The vehicles must be marked with an orange-coloured plate and a transport

document must be carried on board the vehicle. Only general information needs to be entered in the transport document. For this kind of transport operations intensive training is required.

25. The representative of Romania comments on the system applied in Romania as follows:
  - In Romania, as in the United Kingdom, there are no exemptions from the provisions of RID/ADR on the transport of dangerous wastes either.
  - Offences are punishable by quite severe fines.
  
26. The representative of Hungary comments on the system applied in Hungary as follows:
  - In Hungary, there are several ordinances and laws concerning waste management. The first ordinance dates back to 1996. Since 2000, a general law has been applicable. In 2001, an implementing ordinance entered into force according to which industrial enterprises may only transport, collect etc. wastes after having obtained permission from the environmental protection agencies. Classification is made with the assistance of experts.
  
27. The representative of Croatia comments on the system applied in Croatia as follows:
  - In Croatia, there are no regulations in force for the domestic transport of dangerous wastes.
  - The carriage of dangerous wastes primarily involves international transport operations which are carried out by foreign companies in accordance with the provisions of RID/ADR.
  
28. In a presentation, a FEAD representative shows practical problems which may be encountered by the waste disposal companies during the carriage of dangerous wastes and makes the following comments:
  - The aims of FEAD are:
    - maintaining the level of safety of RID/ADR;
    - ensuring compliance with the obligation to obtain information on the wastes to be carried;
    - development of a special approach for cases in which the available information is insufficient and
    - development of practice-oriented provisions.
  
  - Problems have occurred with
    - the proper classification;
    - the selection of the proper packaging since chemical compatibility has to be established by the manufacturer of the packaging;
    - the labelling which raises the question as to whether the danger labels should be glued to the container or simply attached to it and whether the UN number may also be indicated on the danger label and
    - the preparation of the transport documents since it is sometimes more appropriate to indicate the name of the waste instead of the technical name, and the quantity carried can in many cases only be estimated.
  
  - Proposals for a solution:
    - introduction of special provisions on clinical wastes and hazardous household wastes; the latter should be harmonized with national regulations;
    - no individual labelling, no safety data sheet and only a generic transport document for empty packagings and batteries;
    - authorisation of aerosol dispensers for carriage in bulk;
    - use of UN numbers 3077 and 3082 for the carriage of polyhalogenated bi- and terphenyls in bulk;

With regard to the last proposal, the FEAD representative explains that when, for example, filling stations are disposed of, a content of more than 1000 mg/kg of polyhalogenated bi- and terphenyls in the waste is quite possible; by 2010, however, all transformers containing such substances are to be disposed of. He adds that in RID/ADR no distinction is made between filled and empty transformers and, therefore, suitable trays containing absorbent material have to be used for the transport of empty transformers, too.

*(Note of the chairman: The relevant "trays" must only be large enough to contain the relevant device and be capable of absorbing at least 1.25 times the volume of the liquid polyhalogenated bi- and terphenyls contained in the device. For example, an empty transformer in which only 100 out of 1000 litres of liquid polyhalogenated bi- and terphenyls have remained must be carried in a packaging providing enough space for the device and 125 litres of liquid - and not 1250 litres.)*

29. The chairman comments on the presentation of the FEAD representative as follows:
- In accordance with RID/ADR, a safety data sheet is not required. These safety data sheets are required by EC Directive 67/548/EEC. Although they do contain both information which may be used for classification and information on the transport operation in accordance with the dangerous goods regulations, they do not contain all information needed for a proper classification in accordance with the dangerous goods regulations. They often refer to the pure substance which, as a rule, leads to over-classification in accordance with the dangerous goods regulations.
  - Provisions on the transport in bulk of aerosol dispensers will be included in the dangerous goods regulations as of 1 January 2007.
  - An assignment of polyhalogenated bi- and terphenyls in bulk to the UN numbers 3077 and 3082 is not possible since the level of safety would be reduced. Polyhalogenated bi- and terphenyls must be assigned to the class 9 entries (UN 2315, UN 3151, UN 3152 and UN 3432) in the dangerous goods regulations. In cases where the limit of 1000 mg/kg is exceeded and thus a transport in bulk is not possible any more, Intermediate Bulk Containers (IBCs) having a capacity of up to three cubic metres may still be used.
30. The representative of France, being supported by the representative of the United Kingdom, proposes to use the document prepared by FEAD as a basis for the development of the necessary regulations for the transport of dangerous wastes. This proposal is approved by the working group.
31. In the absence of a Swedish representative, the document submitted by Sweden, in which the Swedish system for the transport of dangerous wastes is described, is not presented once more in the working group.
32. The representative of Austria finally points out that the transport in bulk is only possible in the case of solid wastes. He also notes that even hazardous household wastes must on principle be classified.

**Agenda item 3: Presentation of, and discussion on, Multilateral Agreement M 172 (ADR) / Multilateral Special Agreement RID 5/2005 (RID) proposed by Austria**

33. The representative of Austria presents Multilateral Agreement M 172 (ADR) and/or Multilateral Special Agreement RID 5/2005 (RID) and makes the following comments:
- The content of the multilateral agreements is not suitable for inclusion in the regulations; the agreements are rather a means for examining whether international transport operations are successfully carried out in accordance with the proposed system. They only deal with specific

- aspects of the transport of wastes and only with wastes that are considered as wastes in the waste management legislation.
- In order to facilitate the assignment of dangerous wastes, all four conditions that are stated under sub-section 2.1.1 of both multilateral agreements must be met.
  - The regulation in section 4.1 of the multilateral agreements will become redundant as of 2007 when a relevant regulation will be included in RID/ADR.
  - The indication of the UN number on the danger label should be generally authorised since this could help reduce costs.
  - The topics referred to in the special agreement should be addressed in some way in RID/ADR.
34. A FEAD representative reports in this context that, according to the information available to him, the admixture of other material by mistake has led to smouldering fires and that the control of such admixture is very difficult. Moreover, the transport of packagings after expiry of the permitted period of use does only concern plastics packagings. Affixing labels using a tape is prohibited in Germany. An exemption from the indication of weight is required. Sub-section 1.1.3.1 is interpreted in such a way that an exemption is on principle granted to private individuals. As soon as the waste disposer receives, for example, medicines he is subject to the dangerous goods regulations. However, the question arises as to whether these medicines may also be carried as normal household waste.
35. The representative of France explains that the indication of the technical name should not be required for the transport of wastes and that it is not always necessary to prescribe transport in accordance with the conditions of packing group I if there is evidence that the wastes do not fall within packing group I. The regulation concerning the admixture of other material by mistake should, in its current form, not be incorporated in RID/ADR. The verification of the chemical compatibility may be difficult when hazardous household wastes are collected.
36. The chairman points out that when hazardous household wastes are collected, the collection bins have to be opened and closed over and over again; under RID/ADR, this is not permitted during transport and therefore a relevant regulation should be incorporated in RID/ADR.
37. The representative of Belgium points out that, in accordance with RID/ADR, a simplified assignment of dangerous wastes as provided for in sub-section 2.1.1 c) of the multilateral agreements is already possible and that there is a problem with medicine which originally was exempted and now falls under the provisions of RID/ADR as waste.
38. The representative of Switzerland explains that the expression “odour” used in sub-section 2.1.1 of the multilateral agreements should be deleted. Furthermore, in his opinion, the regulations under sub-sections 2.1.2 and 2.1.3 of the multilateral agreements are redundant. He also agrees with the representative of France that the regulations concerning the admixture of other material by mistake should not be incorporated in RID/ADR. In his opinion, all products that are packed in retail packagings and thus exempted should be treated equally, irrespective of whether or not they are transported as wastes.
39. The representative of the United Kingdom asks whether it is also permissible in accordance with section 2.3 of the multilateral agreement to carry individual tablets or whether only blister packagings containing tablets may be carried. Furthermore, she notes that the regulations on the information to be entered in the transport document are acceptable whereas the regulations on classification and the packagings to be used are too far-reaching.

40. The representative of Austria answers the questions that have arisen as follows:
- Section 2.3 of the multilateral agreements refers to half-empty blister packagings but not to individual tablets.
  - A general regulation should be included in sub-section 1.1.3.1 in order to regulate the return of wastes (used batteries, old medicines etc.).
  - A distinction must be made between tablets disposed of by households and tablets collected by the chemist's.

**Agenda item 4: European waste law**

41. The chairman asks whether it would be helpful to integrate European waste law in RID/ADR. He points out that EWC numbers are based on the origin of the wastes and, therefore, it is possible that various UN numbers fall under the same EWC number.
42. The representative of Austria notes that in the current version of RID/ADR there are already many references to EU directives and that in this context the EWC number only serves as an indicator; however, what is important with regard to carriage is the description of the waste. He stresses that the technical name may never be deleted - not even in accordance with Multilateral Agreement M 172 (ADR) or Multilateral Special Agreement RID 5/2005 (RID) initiated by Austria.
43. The representative of Belgium is of the opinion that the technical name is dispensable if its establishment involves an unreasonable effort. However, this should not be a general regulation but a regulation which is linked, for example, with paragraph 2.1.3.5.2 of RID/ADR.
44. The representative of Switzerland agrees with the representative of Belgium and explains that the technical name is not a great contribution to transport safety. In his view, however, the indication of the relevant risks may not be dispensed with. He points out that the waste disposal certificate contains both the EWC number and the description of the relevant waste and proposes that dispensing with the indication of the technical name should be made subject to the conditions of sub-section 1.1.3.6, where appropriate.
45. Regarding this, the representative of France says that it is difficult for the supervisory authorities to establish whether the effort for the indication of the technical name would have been low. A relevant regulation could prompt the enterprises concerned to look for ways and means for avoiding the obligation to indicate the technical name. Therefore, he is of the opinion that there should be a link with the classification rules and that it should be mandatory to indicate the EWC number if the technical name cannot be indicated. As a consequence, however, the EWC numbers would have to be applied in non-EU states, too.
46. The chairman summarizes the opinions stated and notes that, if the technical name cannot be indicated, the EWC number should be indicated instead.

**Agenda item 6: Preparation of the requirements relating to the transport of dangerous wastes**

47. As already set out in paragraph 30 of this report, the requirements for the transport of dangerous wastes should be developed on the basis of the document prepared by FEAD. In this context, the possibilities for simplifying classification are discussed.



48. A FEAD representative explains that the expression “classification not possible” means that classification is only possible if very costly and time-consuming steps are taken. Moreover, the heterogeneity of the wastes plays a decisive role in their proper classification.
49. The representative of Switzerland poses the fundamental question whether industrial wastes and household wastes should be treated equally. In his view, a distinction has to be made since industrial wastes are mostly generated in large quantities and industry is capable of carrying out an analysis.
50. The representative of France is of the opinion that, at the same time, a scope of application must be defined if the transport of wastes is to be facilitated. A distinction between industry and households is insufficient since there are also one-man businesses and therefore the question arises as to whether such businesses are also covered by the expression "industry". If a precise classification is not practicable, this may also lead to over-classification. Instead of the technical name, the denomination in accordance with European waste law or the EWC number may be used in the transport document. In order to avoid that the transport of tanks is ruled out in advance, it should be considered whether an assignment to packing group II is possible, provided that the dangerous waste does not contain any substances of packing group I.
51. The representative of Belgium notes that first of all the basic principles for derogation from the classification should be laid down. In this context, it must be avoided that a financial benefit arises from the fact that the consignor has no information available or does not want to establish it. This means that in cases where no information about the properties of a substance is available, the relevant conditions of carriage should be determined by a competent authority stipulating the relevant conditions (e.g. use of a packaging of packing group I); this would, as a consequence, make such transport operations more expensive. Furthermore, distinctions should be made with regard to the classification of industrial waste on the one hand and waste collection systems for households on the other. It must also be ensured that the classification is applied to the transport operation and not to the actual waste disposal.
52. As regards the assignment of the relevant packing group, the representative of Switzerland holds the view that packing group II should not be generally authorised. Especially in cases where large quantities are to be transported an analysis must be carried out and a justification should be provided for not choosing the most stringent classification.
53. The representative of Germany points out that the current version of ADR does not contain any instructions on how to proceed if the waste cannot be classified on the spot. It must be avoided that those involved destroy information in order to be able to carry wastes under less stringent conditions. In order to achieve this, the requirements for non-classified wastes must be particularly stringent.
54. The representative of France points out that section 2.1.3 of RID/ADR already contains a basis for the proper classification of dangerous wastes. However, he also notes that the table of precedence of hazards in sub-section 2.1.3.10 of RID/ADR cannot be applied if the packing group is unknown. Therefore, packing group I should be taken as a basis if it cannot be proved that the substances do not fall under packing group I. He proposes to add a note to section 2.1.3 in order to make clear that classification in accordance with this section does not apply to waste disposal. He agrees to prepare a relevant draft text for the next meeting.

#### **Agenda item 7: Miscellaneous**

55. Speaking on a matter not on the agenda, the representative of Croatia asks for opinions on the transport of old railway sleepers. This concerns the transport of old railway sleepers that are replaced during the maintenance of railways. These railway sleepers were treated 30 to 40 years ago with creosote oil, a substance which is dangerous to the environment, for the purpose of conservation.
56. The chairman explains with regard to this matter that, to his knowledge, old railway sleepers were treated with creosote oils and that even after 30 to 40 years the wood may still contain enough creosote oils so that an assignment to class 9, UN 3077, is required. This applies in cases where the creosote oil content exceeds 25%, by mass. A completely different problem arises from the possible pollution with pesticides and polyhalogenated bi- and terphenyls. Therefore, the railway sleepers should be examined for the presence of these substances. If the limit of 50 mg/kg for polyhalogenated bi- and terphenyls is exceeded, railway sleepers must be transported under the conditions applicable to these substances. In the case of pesticides it must be examined whether the criteria for assignment to class 6.1 are fulfilled. An assignment to a UN number on the basis of a waste code from the EU Waste Directive is not possible.
57. A FEAD representative draws attention to the fact that the problem of polyhalogenated bi- and terphenyls often occurs with such old railway sleepers and that there may be some of them which exceed the limit of 1000 mg/kg so that even transport in bulk is not possible any more.
58. The representative of France explained that these railway sleepers, in accordance with the EU Waste Directive, fall under a waste code due to their environmentally hazardous properties; however, he said that they would not fall under the provisions of RID/ADR since the relevant UN numbers (UN 3077 and UN 3082) had to be assigned only substances or mixtures fulfilling the applicable criteria of the Council Directive 67/548 EEC on the approximation of laws, regulations and administrative provisions relating to the classification, packaging and labelling of dangerous substances. If the limit for polyhalogenated bi- and terphenyls is exceeded, transport in bulk is prohibited, in which case specific provisions would be required for the carrying out of transport operations in the framework of RID/ADR.

#### **Next meeting**

59. The representative of Germany proposes to hold another meeting in order to continue the works of the working group on the basis of the list from the FEAD document. At this meeting, an excursion should be put on the agenda enabling the participants to get an idea of the practical problems on the spot (inspection of a collecting point for toxic wastes and a HazMobile). He agreed that Germany would continue the management of the working group and extend the invitations to the next meeting. In addition, he proposes that for the time being no report should be submitted to the Joint RID/ADR/AND Meeting. The report should only be submitted after the next meeting when first results are available. These proposals are adopted by the working group.
60. As date for the next meeting the 17<sup>th</sup> calendar week of 2006 is proposed. However, due to the tight schedule, this meeting must be postponed to 2 and 3 May 2006. It will again take place in the Federal Ministry of Transport, Building and Housing in Bonn (room 0.105).