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Item 5(a) of the provisional agenda

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

Carriage of empty uncleaned packaging wastes

Transmitted by the Government of France^{1, 2}

Summary

Explanatory summary: Simplification and facilitation of the carriage of empty uncleaned packaging wastes (EUPWs), with suitable safety requirements.

Decision to be taken: Include a special provision in Chapter 3.3 and add this special provision in Table A of Chapter 3.2 in front of :

- Option A: one new dangerous good identification number, 7000, corresponding to all EUPWs;
- Option B: three new dangerous good identification numbers, according to the presence of a toxicity or oxidising risk in the EUPW;
- Option C: an exhaustive list of nine new dangerous good identification numbers, based on all the possible combinations of risks presented by EUPWs.

¹ In accordance with the programme of work of the Inland Transport Committee for 2010-2014 (ECE/TRANS/208, para.106, ECE/TRANS/2010/8, programme activity 02.7(c)).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2012/9.

Preliminary remarks

1. In this document, the acronym “EUPW” is used for “Empty uncleaned packaging waste”.
2. The expression “Used packaging for disposal” could be used everywhere instead of “Empty uncleaned packaging waste”, if the Joint Meeting considers this more relevant (based on comments received during the last session of the United Nations Sub-Committee of Experts on the Transport of Dangerous Goods).

Introduction

2. Given the growing importance of commercial & industrial waste treatment in the European policies, the European waste management sector is daily involved with significant quantities of wastes composed of damaged or not fit for re-use packagings, large packagings and intermediate bulk containers (IBCs) that are carried to be disposed of.
3. Those packaging wastes cannot be regarded as the “empty uncleaned packagings” referred to in RID/ADR/ADN. Thus, exemptions of 1.1.3.5 related to empty uncleaned packagings do not apply to those packaging wastes.
4. The issue arising is how to simplify and optimize the carriage of wastes from packagings in safe conditions.

Background

5. March 2010: creation by the Joint Meeting of a dedicated working group.
6. June 2010: Bonn working group decided to assign a new special provision to specific UN numbers 3175, 1479, 3243, 3244 and 3077.
7. September 2010: unfortunately no proposal submitted to the Joint Meeting by the Bonn working group.
8. March 2011: France submitted document ECE/TRANS/WP.15/AC.1/2011/25 to the Joint Meeting, taking up the main ideas of the working group. This document raised several issues, mostly concerning subsidiary risks.
9. September 2011: France submitted to the Joint Meeting two alternative options in document ECE/TRANS/WP.15/AC.1/2011/49. The first option was to introduce a special provision, and the second one to add an exemption. Eventually the Joint Meeting decided to keep the first option. A lunchtime working group came up with a draft proposal in informal document INF.53.
10. December 2011: the United Nations Sub-Committee of Experts on the Transport of Dangerous Goods, while discussing informal document INF.24 in its December 2011 session, expressed safety concerns and concerns about the proposed proper shipping name.
11. March 2012: France is submitting this working document, entailing three alternative options, all based on the main ideas of informal document INF.53 presented at the Autumn 2011 session of the Joint Meeting. Some editorial improvements have been added as well as modifications to deal with the comments of the United Nations Sub-Committee of Experts on the Transport of Dangerous Goods (see also paragraphs 30-33 of ST/SG/AC.10/C.3/80).

Proposal

Option A

12. In Table A, insert the new entry presented in annex I.
13. Add a new special provision to chapter 3.3, to read as follows:

"6xv

Definition:

For the purpose of this special provision, the term "Empty uncleaned packaging waste (EUPW)" is defined by: a packaging, large packaging or intermediate bulk container (IBC), or a part thereof, which is carried to be disposed of, and which has been emptied to the extent that only residues stuck to its internal or external walls (or part of walls) are present when it is handed over for carriage.

Scope:

This entry may exclusively be used for the carriage of EUPWs containing residues of hazard Classes 3, 4.1, 5.1, 6.1, 8 or 9, except solids or liquids:

- Assigned to Packing Group I or that have "0" assigned in Column (7a) of Table A of Chapter 3.2;
- Classified as desensitized explosive substances of Class 3 or 4.1, or;
- Classified as self-reactive substances of Class 4.1.

Unless otherwise specified in this special provision, all the relevant requirements of RID/ADR/ADN shall be met.

Specific requirements for mixed packing:

EUPWs having contained goods presenting a hazard or a sub-hazard of Class 5.1 shall not be mixed with EUPWs of any other Class of hazard.

EUPWs may be packed together or packed with non-dangerous goods, provided they do not react dangerously with each other.

Sorting procedures shall be implemented on the loading site to insure the respect of the requirements herein.

Specific requirements for marking and labelling:

In addition to the provisions of Chapter 5.2, packagings containing EUPWs shall bear all the labels corresponding to the Class of hazard or sub-hazard related to each residue present in the EUPWs.

Specific requirements for documentation:

The sequence mentioned in Chapter 5.4 shall be complemented with the words: "having contained" followed by the Class of hazard or sub-hazard corresponding to the residues. For example, a broken packaging having contained a flammable liquid with a subsidiary risk of corrosivity should be referred in the transport document as

"UN 7000 Empty uncleaned packaging waste, 9, having contained 3, 8".

Specific requirements for carriage of EUPW having contained goods with a Class 5.1 hazard or sub-hazard:

Vehicles and containers shall be so constructed either that the substances contained cannot come into contact with wood or any other combustible material, or that the entire surface of the floor and walls, if made of wood or another combustible material has been provided with an impermeable surfacing resistant to combustion or has been coated with sodium silicate or a similar substance."

[Comment: this text comes from VV8]

14. Add the following packing instructions:

- In 4.1.4.1:

P7000	PACKING INSTRUCTION	P7000
Empty uncleaned packaging wastes (EUPWs) shall be packed in a leakproof inner packaging placed inside a suitable rigid metal or plastic outer packaging. The packagings shall meet the provisions of 4.1.1.1, 4.1.1.2, 4.1.1.5, 4.1.1.6, 4.1.1.8 and the relevant provisions of 4.1.3 .		

- In 4.1.4.2:

IBC7000	PACKING INSTRUCTION	IBC7000
The following IBCs are authorized, provided the general provisions of 4.1.1, 4.1.2 and 4.1.3 are met:		
(1) Metal, rigid plastic or composite IBCs approved for liquids for Packing Group III ;		
(2) IBCs for Packing group III and of types 13H3, 13H4 or 13H5, placed in rigid overpacks with complete base and sidewalls.		

- In 4.1.4.3:

LP7000	PACKING INSTRUCTION	LP7000
The following large packagings are authorized, provided the general provisions of 4.1.1 and 4.1.3 are met: Rigid large packagings conforming to the requirements of Chapter 6.6 for solids, at the packing group II performance level, provided :		
<ul style="list-style-type: none"> - large packagings are capable of retaining liquids, and ; - EUPWs are placed in leakproof inner packagings. 		

15. Consequential amendments:

(a) At the end of 1.1.3.5, add the following new Note:

"NOTE: This exemption does not apply to empty uncleaned packaging wastes (EUPWs). For EUPWs, refer to dangerous good identification number 7000 and special provision 6xy of Chapter 3.3."

(b) At the end of 2.2.9.1.2, add the following new subdivision:

"M12 Empty uncleaned packaging wastes (EUPWs) containing residues presenting risks of Classes 3, 4.1, 5.1, 6.1, 8 or 9. See special provision 6xy of Chapter 3.3."

Option B

16. In Table A, insert the new entries presented in annex II.

17. Add a new special provision to chapter 3.3, namely:

"6xy

Definition:

For the purpose of this provision, the term “Empty uncleaned packaging waste (EUPW)” is defined by: a packaging, large packaging or intermediate bulk container (IBC), or a part thereof, which is carried to be disposed of, and which has been emptied to the extent that only residues stuck to its internal or external walls (or part of walls) are present when it is handed over for carriage.

Scope:

This entry may not be used for the carriage of EUPWs containing residues of substances:

- Assigned to Packing Group I or that have “0” assigned in Column 7 a);
- Classified as desensitized explosive substances of Class 3 or 4.1, or;
- Classified as self-reactive substances of Class 4.1.

Requirements:

All the relevant requirements of RID/ADR/ADN shall be met.

Sorting procedures shall be implemented on the loading site to insure the respect of the mixed packing requirements.”.

18. Add the following packing instructions:

- In 4.1.4.1:

P7000	PACKING INSTRUCTION	P7000
Empty uncleaned packaging wastes (EUPWs) shall be packed in a leakproof inner packaging placed inside a suitable rigid metal or plastic outer packaging. The packagings shall meet the provisions of 4.1.1.1, 4.1.1.2, 4.1.1.5, 4.1.1.6, 4.1.1.8 and the relevant provisions of 4.1.3 .		

- In 4.1.4.2 :

IBC7000	PACKING INSTRUCTION	IBC7000
The following IBCs are authorized, provided the general provisions of 4.1.1, 4.1.2 and 4.1.3 are met:		
(1) Metal, rigid plastic or composite IBCs approved for liquids for Packing Group III ;		
(2) IBCs for Packing group III and of types 13H3, 13H4 or 13H5, placed in rigid overpacks with complete base and sidewalls.		

- In paragraph 4.1.4.3 :

LP7000	PACKING INSTRUCTION	LP7000
The following large packagings are authorized, provided the general provisions of 4.1.1 and 4.1.3 are met: Rigid large packagings conforming to the requirements of Chapter 6.6 for solids, at the packing group II performance level, provided :		
<ul style="list-style-type: none"> - large packagings are capable of retaining liquids, and ; - EUPWs are placed in leakproof inner packagings. 		

19. Consequential amendments:

(a) At the end of 1.1.3.5, add the following new Note:

"NOTE: This exemption does not apply to empty uncleaned packaging wastes (EUPWs). For EUPWs, refer to dangerous good identification numbers 7001 to 7003 and special provision 6xy of Chapter 3.3."

(b) At the end of 2.2.9.1.2, insert the following new subdivision:

"M12 Empty uncleaned packaging wastes (EUPWs) containing residues presenting risks or subsidiary risks corresponding to Classes 3, 4.1, 8 or 9. See special provision 6xy of Chapter 3.3."

(c) In 2.2.61.1.2, after "T9 Other toxic substances", insert the following subdivision:

"T10 Empty uncleaned packaging wastes (EUPWs) containing residues presenting risks or subsidiary risks corresponding to Class 6.1 and that may present risks or subsidiary risks corresponding to Classes 3, 4.1, 8 or 9. See special provision 6xy of Chapter 3.3."

(d) In 2.2.51.1.2, after "O3 Articles", insert the following new subdivision:

"O4 Empty uncleaned packaging wastes (EUPWs) containing residues presenting risks or subsidiary risks corresponding to Class 5.1 exclusively. See special provision 6xy of Chapter 3.3."

Option C

20. In Table A, insert the new entries presented in annex III.

21. Add a new special provision to chapter 3.3, namely:

"6xz

Definition:

For the purpose of this provision, the term "Empty uncleaned packaging waste (EUPW)" is defined by: a packaging, large packaging or intermediate bulk container (IBC), or a part thereof, which is carried to be disposed of, and which has been emptied to the extent that only residues stuck to its internal or external walls (or part of walls) are present when it is handed over for carriage.

Scope:

This entry may not be used for the carriage of EUPWs containing residues of substances:

- Assigned to Packing Group I or that have "0" assigned in Column 7 a);
- Classified as desensitized explosive substances of Class 3 or 4.1, or;
- Classified as self-reactive substances of Class 4.1.

Requirements:

All the relevant requirements of RID/ADR/ADN shall be met.

Sorting procedures shall be implemented on the loading site to insure the respect of the mixed packing requirements."

22. Add the following packing instructions:

- In 4.1.4.1:

P7000	PACKING INSTRUCTION	P7000
Empty uncleaned packaging wastes (EUPWs) shall be packed in a leakproof inner packaging placed inside a suitable rigid metal or plastic outer packaging. The packagings shall meet the provisions of 4.1.1.1, 4.1.1.2, 4.1.1.5, 4.1.1.6, 4.1.1.8 and the relevant provisions of 4.1.3 .		

- In 4.1.4.2:

IBC7000	PACKING INSTRUCTION	IBC7000
<p>The following IBCs are authorized, provided the general provisions of 4.1.1, 4.1.2 and 4.1.3 are met:</p> <p>(1) Metal, rigid plastic or composite IBCs approved for liquids for Packing Group III ;</p> <p>(2) IBCs for Packing group III and of types 13H3, 13H4 or 13H5, placed in rigid overpacks with complete base and sidewalls.</p>		

- In 4.1.4.3:

LP7000	PACKING INSTRUCTION	LP7000
<p>The following large packagings are authorized, provided the general provisions of 4.1.1 and 4.1.3 are met: Rigid large packagings conforming to the requirements of Chapter 6.6 for solids, at the packing group II performance level, provided :</p> <ul style="list-style-type: none"> - large packagings are capable of retaining liquids, and ; - EUPWs are placed in leakproof inner packagings. 		

23. Consequential amendments:

- (a) At the end of 1.1.3.5, add the following new Note:

"NOTE: This exemption does not apply to empty uncleaned packaging wastes (EUPWs). For EUPWs, refer to dangerous good identification numbers 7001 to 7009 and Special Provision 6xz of Chapter 3.3."

- (b) At the end of 2.2.9.1.2, add the following line:

"M12 EUPWs containing residues presenting risks or subsidiary risks corresponding to Class 9 exclusively. See Special Provision 6xz."

- (c) In paragraph 2.2.8.1.2, after "C11 Articles", insert the following new subdivision:

"C12 Empty uncleaned packaging wastes (EUPWs) containing residues presenting risks or subsidiary risks corresponding to Class 8 exclusively. See special provision 6xz of Chapter 3.3."

- (d) In 2.2.41.1.2, after "F3 Inorganic", insert the following new subdivision:

"F4 Empty uncleaned packaging wastes (EUPWs) containing residues presenting risks or subsidiary risks corresponding to Classes 3 or 4.1 exclusively. See special provision 6xz of Chapter 3.3."

- (e) In 2.2.41.1.2, after "FC2 Inorganic, corrosive", insert the following new subdivision:

"FC3 Empty uncleaned packaging wastes (EUPWs) containing residues presenting risks or subsidiary risks corresponding to Classes 3 or 4.1 together with a Class 8 risk or subsidiary risk. See special provision 6xz of Chapter 3.3."

- (f) In 2.2.61.1.2, after "T9 Other toxic substances", insert the following new subdivision:

"T10 Empty uncleaned packaging wastes (EUPWs) containing residues presenting risks or subsidiary risks corresponding to Class 6.1 exclusively. See special provision 6xz of Chapter 3.3."

- (g) In 2.2.61.1.2, after "TC4 Inorganic, solid", insert the following new subdivision:

"TC5 Empty uncleaned packaging wastes (EUPWs) containing residues presenting risks or subsidiary risks corresponding to Class 6.1 together with a Class 8 risk or subsidiary risk. See special provision 6xz of Chapter 3.3."

(h) In 2.2.61.1.2, after "TF3 Solid", insert the following new subdivision:

"TF4 Empty uncleaned packaging wastes (EUPWs) containing residues presenting risks or subsidiary risks corresponding to Class 6.1 together with a Class 3 or 4.1 risk or subsidiary risk. See special provision 6xz of Chapter 3.3."

(i) In 2.2.51.1.2, after "O3 Articles", insert the following new subdivision:

"O4 Empty uncleaned packaging wastes (EUPWs) containing residues presenting risks or subsidiary risks corresponding to Class 5.1 exclusively. See special provision 6xz of Chapter 3.3."

Annex I

New entry for Option A

(1)	(2)	(3a)	(3b)	(4)	(5)	(6)	(7a)	(7b)	(8)	(9a)	(9b)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
7000	EMPTY UNCLEARED PACKAGING WASTE (EUPW)	9	M12		9	6xv	0	E0	P7000 IBC7000 LP7000			BK1 BK2					(E)		VV10			90

Annex II

New entries for Option B

(1)	(2)	(3a)	(3b)	(4)	(5)	(6)	(7a)	(7b)	(8)	(9a)	(9b)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
7001	EMPTY UNCLEANNED PACKAGING WASTE (EUPW), containing flammable, corrosive or environmentally hazardous residues, non toxic, non oxidizing	9	M12		9	6xw	0	E0	P7000 IBC7000 LP7000			BK1 BK2					(E)		VV10			90
7002	EMPTY UNCLEANNED PACKAGING WASTE (EUPW), containing flammable, corrosive or environmentally hazardous residues, toxic or with a subsidiary risk of toxicity, non oxidizing	6.1	T10		6.1	6xw	0	E0	P7000 IBC7000 LP7000			BK1 BK2					(E)		VV10			60
7003	EMPTY UNCLEANNED PACKAGING WASTE (EUPW), containing oxidizing residues or residues presenting an oxidizing subsidiary risk	5.1	O4		5.1	6xw	0	E0	P7000 IBC7000 LP7000		MP2	BK1 BK2					(E)		VV8			50

Annex III

New entries for Option C

(1)	(2)	(3a)	(3b)	(4)	(5)	(6)	(7a)	(7b)	(8)	(9a)	(9b)	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)	(19)	(20)
7001	EMPTY UNCLEANNED PACKAGING WASTE (EUPW), containing environmentally hazardous residues	9	M12		9	6xz	0	E0	P7000 IBC7000 LP7000			BK1 BK2					(E)		VV10			90
7002	EMPTY UNCLEANNED PACKAGING WASTE (EUPW), containing corrosive residues	8	C12		8	6xz	0	E0	P7000 IBC7000 LP7000			BK1 BK2					(E)		VV10			80
7003	EMPTY UNCLEANNED PACKAGING WASTE (EUPW), containing flammable residues	4.1	F4		4.1	6xz	0	E0	P7000 IBC7000 LP7000			BK1 BK2					(E)		VV10			30
7004	EMPTY UNCLEANNED PACKAGING WASTE (EUPW), containing flammable corrosive residues	4.1	FC3		4.1 +8	6xz	0	E0	P7000 IBC7000 LP7000			BK1 BK2					(E)		VV10			38
7005	EMPTY UNCLEANNED PACKAGING WASTE (EUPW), containing toxic residues	6.1	T10		6.1	6xz	0	E0	P7000 IBC7000 LP7000			BK1 BK2					(E)		VV10			60
7006	EMPTY UNCLEANNED PACKAGING WASTE (EUPW), containing toxic corrosive residues	6.1	TC5		6.1 +8	6xz	0	E1	P7000 IBC7000 LP7000			BK1 BK2					(E)		VV10			68
7007	EMPTY UNCLEANNED PACKAGING WASTE (EUPW), containing toxic flammable residues	6.1	TF4		6.1 +4.1	6xz	0	E2	P7000 IBC7000 LP7000			BK1 BK2					(E)		VV10			63
7008	EMPTY UNCLEANNED PACKAGING WASTE (EUPW), containing toxic flammable corrosive residues	6.1	TFC		6.1 +4.1 +8	6xz	0	E3	P7000 IBC7000 LP7000			BK1 BK2					(E)		VV10			638
7009	EMPTY UNCLEANNED PACKAGING WASTE (EUPW), containing oxidizing residues	5.1	O4		5.1	6xz	0	E4	P7000 IBC7000 LP7000		MP2	BK1 BK2					(E)		VV8			50