Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods **15 September 2016**

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

Geneva, 19–23 September 2016
Item 5 (b) of the provisional agenda
Proposals for amendments to RID/ADR/ADN: new proposals

Simplification of the packaging for transport - double use of waste collection containers

Amendment by the FEAD, European Federation of Waste Management and Environmental Services

Background

1. In accordance with the definitions in section 1.2.1 ADR, an intermediate bulk container (IBC) is a packaging, which is not mentioned in chapter 6.1 ADR. Chapter 6.1 rather specifies drums, cans, boxes, combinations and light gauge metal packaging, which are used as packaging approved for dangerous goods, as under the packing group I-III.

2. In recent years, manufacturers got packings/transport packaging tested that have been manufactured to the same design and got them approved in each case as both box (4A) and IBC (11A) by the competent authorities. An identical container meeting both test requirements therefore complies with the requirements of the test specifications of the respective type approval in chapter 6.1 and 6.5 of the ADR. Thus such universally usable transport packaging can be considered suitable for both small receptacles and unpackaged solid substances. 500.000 units of those types of containers are currently being used throughout Europe.

Discussion

3. If the status quo is maintained, the following procedure is formally to be applied:

(a) Packaged dangerous goods in small receptacles and unpackaged dangerous goods limited to a maximum net mass of 400 kg may be transported only in boxes meeting the test requirements of chapter 6.1 of the ADR.

Identical packaging, meeting the test requirements of chapter 6.5 of the ADR, can be used only for unpackaged dangerous goods.

A double coding of identical containers and therefore a double use is prohibited.

(b) IBC, which do not meet the requirements under chapter 6.1 of the ADR would subsequently have to be tested under these requirements and to be transcoded accordingly. Thereafter, their use for unpackaged and packaged dangerous goods is permitted. However, in contrast to the use in accordance with chapter 6.5 of the ADR, the

use as a container in accordance with the requirements of chapter 6.1 of the ADR limits the maximum permissible net mass to 400kg.

4. The experiences in practice with transporting dangerous goods show that double use/double coding of identical containers does not lead to any problems or security incidents. In daily practice, the responsible packer can decide himself in what form he will use the container and documents this clearly in the relevant transport document. In this way, the type of application of the containers is transparent and comprehensible also for controlling authorities. The use as a box or an IBC is fundamentally documented in the transport document; the simultaneous use under both type approvals is excluded. The marking as IBC or box is adapted to the respective use and the labelling is made in unequivocal manner in accordance with the use.

5. Having both type approvals and meeting both test requirements, the container meets both the criteria of a box (4A) and those of an IBC (11A). The limitation to only one code would be a pure formality and bring no safety benefits in practice. Practice in the European waste management industry has proved that double use, which is linked to a clear marking in accordance with the respective use, makes sense and ensures the safety of dangerous goods transportation. Furthermore, due to the double approval, the steel box will be regularly tested every 2.5 years (although not required). Undoubtedly, the double use allows a flexible application for all users, adapted to the filling with small receptacles (4A) or solid unpackaged dangerous goods (11A). Both applications are standard in the waste management industry throughout Europe for decades.

Amendment

6. With regard to a practicable application of the ADR to the transport of small receptacles as well as to unpackaged substances in universally usable transport packaging, double coding and thus double use of the transport packaging must be realized.

7. The definition in chapter 1.2.1 of the ADR should be adapted as follows: “Intermediate bulk container" (IBC) means a rigid, or flexible portable packaging, ~~other than those specified in chapter 6.1~~, that:..."

8. The definition intends to allow the possibility for a container meeting the test requirements of chapter 6.1 and 6.5 ADR to be used under the respective packing group.

Justification:

9. For the transport of small receptacles, placed in transport packaging, a box (4A) is required as approved outer packaging. However, for the transport of unpackaged dangerous goods, which are filled into the container, an approval as IBC (11A) is required. Both applications are standard in European waste management industry. Practice has proved that double use makes sense and ensures the safety of dangerous goods transportation. In addition, the steel box will now be tested repeatedly after 2.5 years!

10. The proposed amendment adjusts the provision to the practicalities of transportation.

11. The practice has proved that double use, which is linked to a clear marking in accordance with the respective use, makes sense and ensures the safety of dangerous goods transportation.

12. Undoubtedly, the double use allows a flexible application for all users, adapted to the filling with small receptacles (4A) or solid unpackaged dangerous goods (11A). Both applications are standard in the waste management industry for decades in Europe.

Safety: No impact.

Feasibility: Optimization.

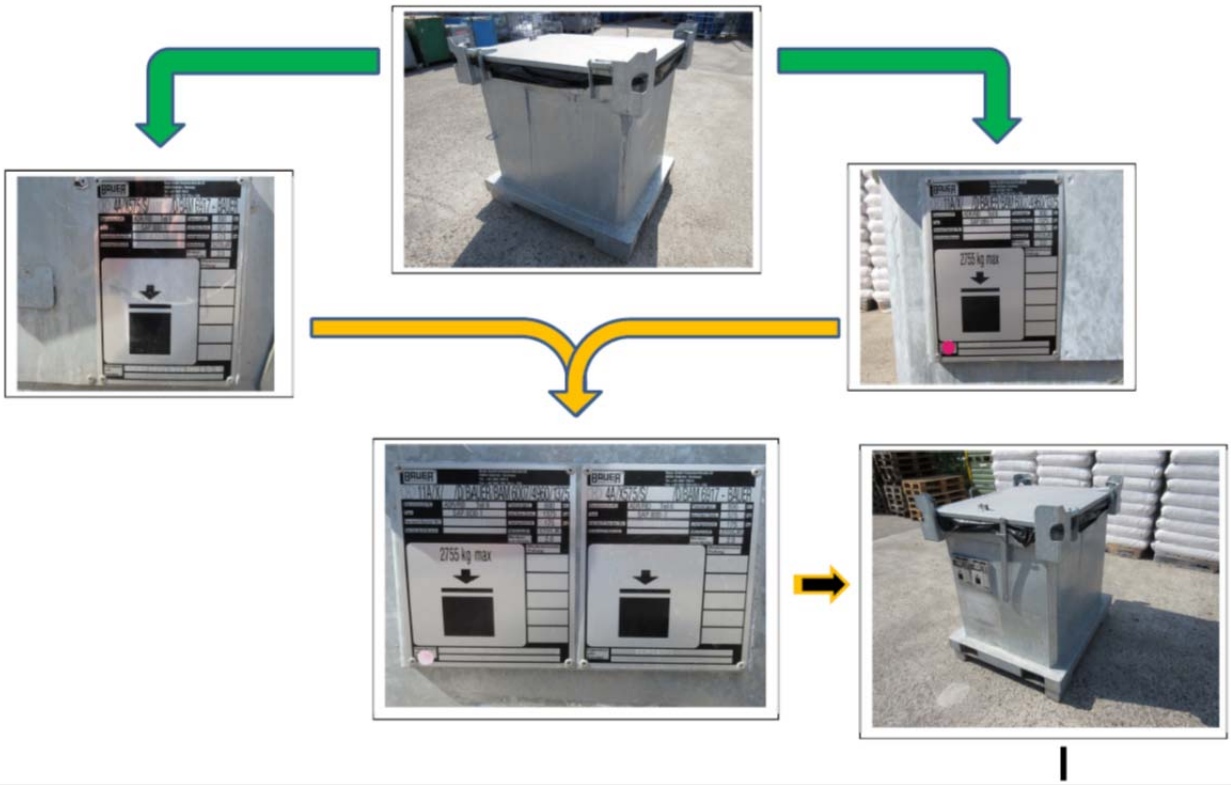
Enforceability: Immediately implementable.

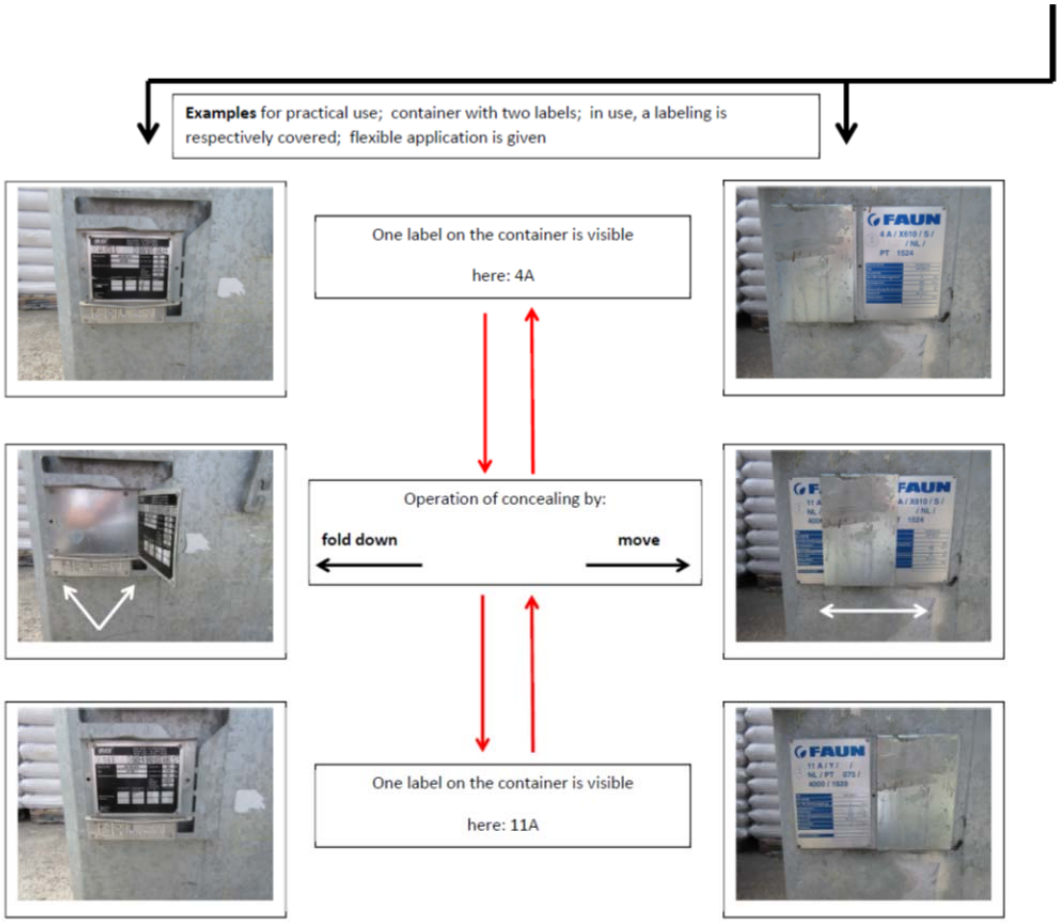
Labeling: **containers which fulfill the regulations of construction and testing**

chapter 6.1 **4A box of steel**

chapter 6.5 **11A IBC of steel (rigid)**

figure of labeling and use/handling:




Examples for practical use; container with two labels; in use, a labeling is respectively covered; flexible application is given
One label on the container is visible
here: 4A
Operation of concealing by:
fold down
move
One label on the container is visible
here: 11A
FAUN