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## **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**

Bern, 12-16 March 2018

6 March 2018

Item 4 of the provisional agenda

**Interpretation of RID/ADR/ADN**

### **Use of used packagings for the carriage of dangerous goods waste**

#### **Transmitted by the Government of France**

1. The use of used packagings for the carriage of dangerous goods waste is a practical solution that allows facilitates the waste management procedure by incinerating the packaging with the waste.
  2. However, this generates a problem concerning the assessment of the chemical compatibility (chapter 6.1.6, 6.1.5.2.6 and 4.1.1.21.6, column 5 standard liquid) when using plastic packagings. As the substance carried is not clearly identified neither the chemical compatibility testing nor the reference of an appropriate standard liquid is feasible.
  3. Not doing this assessment may not generate a risk because the packaging is only used once for carriage of the waste substance and for a short time.
  4. The carriage of wastes is in many cases covered by some specific national rules (in cases of EU members states derogations under article 6 of directive 2008/68/CE).
  5. The Issue has been raised recently as to know if it would be of some benefit to allow for some exemption of such nature in the international regulation of RID ADR ADN
  6. In view of the above mentioned issue France would be interested to know if similar issues have been raised in other contracting parties, what kind of solutions have been applied, and under which conditions (in particular are there limitations ensuring the short time of use or minimal alternative compatibility testing, for instance with at least one standard liquid ...)
  7. If there is interest for developing requirements allowing such practice, France would be ready to prepare a proposal for the next session.
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