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Working Party on the Transport of Dangerous Goods**
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Item 6 of the provisional agenda
Reports of informal working groups

Information on the quantity transported in the transport document

Transmitted by European Federation of Waste Management and Environmental Services (FEAD) on behalf of the informal working group on the transport of hazardous waste^{*,}**

Summary

- Executive summary:** The topic on requirements for the entry “quantity transported in the transport document” is resumed considering the practical feasibility of the provisions, in view of solutions currently existing at national level (German and Austrian case).
- Action to be taken:** Amendments of RID/ADR 5.4.1.1.1 (f) are proposed.

Introduction

1. This proposal is the result of the informal working group dedicated to the transport of (hazardous) waste of the Joint Meeting. It is relevant to note that the informal working group met in two different occasions: a first in April 2019 in Brussels (see ECE/TRANS/WP.15/AC.1/2019/34), and a second one in March 2020 in Utrecht (see ECE/TRANS/WP.15/AC.1/2020/59). The modifications proposed in the present document are the result of the second meeting and agreed by its participants in that occasion.
2. This document considers the problematics arising from the provision on “quantity transported in the transport document” outlined in RID/ADR 5.4.1.1.1 (f). In particular, it

* 2020 (A/74/6 (Sect.20) and Supplementary, Subprogramme 2).

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deals with the introduction of the information of mass in the transport document and issues arising from this specific provision.

Background

3. For practical reasons, it is sometimes not feasible to put the exact mass of the waste in the transport document. There should be a certain degree of tolerance by having an estimated quantity for waste, as it is allowed on the specific waste consignment note set by environmental legislation. The exact mass is always measured and recorded in the waste register of the treatment plant. It is only during transport that it is not always possible to know the exact mass of the waste as the loader does not always provide this information. A solution within RID/ADR is desirable, for packaged waste as well as for bulk transport of waste.

4. It is also relevant to note that current provisions on estimation of the mass exist within national provisions of certain countries, namely Germany (German exemption 18) and Austria (multilateral agreement RID 1/2015 / M287, point 6.1).

Proposal

5. Amend RID/ADR 5.4.1.1.1 as follows:

After paragraph (f), introduce an additional note:

“NOTE 3: Where dangerous goods have a waste status and there is no possibility to mass the waste at the place of loading, the mass will be estimated in function of the nominal volume of each container, tank or packaging. In the latter case, a list of packagings including the type and the nominal volume will be added.”

In particular, the following limitations should apply:

- a) *The note cannot be used for dangerous goods having a waste status containing:*
 - *Substances mentioned in 2.1.3.5.3;*
 - *Substances of Class 4.3;*
 - *Substances of case mentioned in 2.1.3.7; or*
 - *Substances which are not accepted for carriage in accordance with 2.2.x.2;*
- b) *For packaging, an estimation of the mass (based on nominal volume) is acceptable for waste falling under RID/ADR classification and provided all provisions of RID/ADR are met, except in case an exemption **under transport category 4, 1, 2, 3 of article 1.1.3.6.** is applied (~~1.1.3.6~~);*

mass (b)

- c) *For tank and container, an accurate estimation of the mass based on the nominal degree of filling and the density of the loading is acceptable*
- d) *For vacuum tank, a visual estimation of the degree of filling is justified.*



Justification

6. This proposal clarifies the situation faced in waste management and has no significant effect on the current risk level.
