

Preparatory document - Informal Working Group on ADR and Waste

19 November 2020

Online

In view of the upcoming meeting on 19 November, this document summarizes key issues under discussion, as well as their state-of-the art and discussions to be foreseen.

1. Issue 4.2: additional information responsible person for class 6.2

This requirement is also taken from the “Orange Book” under 5.4.1.3 and 5.4.1.5.6. For your reference, see [here](#). An extract is reported below.

5.4.1.3 *Consignor, consignee and date*

The name and address of the consignor and the consignee of the dangerous goods shall be included on the dangerous goods transport document. The date the dangerous goods transport document or an electronic copy of it was prepared or given to the initial carrier shall be included.

5.4.1.5.6 *Infectious substances*

The full address of the consignee shall be shown on the document, together with the name of a responsible person and his telephone number.

- Following consultation of the Belgian ADR administrator (Mrs. Sabine Vercruyse), it has not been possible to retrieve the history of the inclusion and the reason why these provisions have been included in the ADR. FEAD experts have verified that this requirement is already present in the 2001 ADR version.
- **Participants are kindly asked to provide more information on when and the reason why this was introduced. A question on the matter could also submitted to UNECE’s Secretariat.**
- The need for checking whether Member States’ rules derived from a EU requirement under Directive 2000/54/EC *on the protection of workers from risks related to exposure to biological agents at work* had emerged in the last meeting. From the analysis of the Directive, it appears that this is not an EU requirement.
- A short analysis of the EU Directive 2000/54:EU is annexed to this document.

- A call was launched to gather inputs from MS on their national requirements.

→ This call for information to Member States is renewed.

2. Issue 1.1: exemption of pharmaceutical products (medicines) ready for use

- The relevant document on issue 1.1 has been modified as agreed during the last ADR informal meeting. The latter will be available for participants in attachment to this document.

→ A call on Member States to provide information on their national requirements is renewed, in particular for Sweden, the UK and Finland.

3. Working document 61 on weight estimation: review of adjusted proposal

- Working document 61 has been updated as of the corrections proposed during the last informal meeting. The latter is available for participants in attachment to this document.

→ Additional discussions during the upcoming meeting are needed on the optimal placement of these provisions (either under 5.4.1.1 or under 5.4.1.1.3).

4. Working document 51 on polymerizing substances: review of adjusted proposal

- Modifications proposed during the informal working group meeting have been transmitted to Germany.
- Germany is expected to submit a modified proposal based on those remarks.

5. Working document 57 on transport of asbestos: review of adjusted proposal

- A feedback of the meeting between FEAD's French ADR expert with the French ADR administration (held on 5 November 2020) will be presented.
- FEAD experts' work on benchmark of common practices in different MS is still ongoing.

→ ADR experts are expected to discuss Special Provision 168: need for interpretation, definition and clarification of scope.

6. Proposal for multilateral agreement for document 62

- A reaction is expected from Belgium on a potential introduction of a multilateral agreement on the matter.

7. Working document 02: waste batteries/used storage batteries, carriage in bulk

- FEAD has ultimate the translation of the incident report transmitted to the informal working group by the Netherlands, with an update for ADR. This document has been shared with participants, together with an incident report transmitted by France.

→ A call for incident reports is renewed.

- FEAD has initiated contacts with treatment plants of Pb-batteries to investigate their transportation. The process is still ongoing, but no significant answer has been received till now.

→ In the upcoming meeting, ADR experts to consider the need to modify AP 08 and to introduce the requirement for plastic liners.

8. Issue 3.3: transport of aerosols and gas cartridges in bulk

- Issue 3.3 is still pending. Austria has to clarify its document.

9. Working document 54: removable dumpster placarding

- Working document 54 illustrates a problem limited to France. No further discussion is envisaged or needed at this level.

10. Point 2.2 on transport of packaged waste – inner packagings packed together and point 2.5 on chemical compatibility

- New points introduced for discussion by FEAD. The document illustrating the proposal is attached to this document.
- Annexes to the document also include information of the drum allowed in The Netherlands and a copy of the UN-certification of the producer.
- The table below illustrates specifications for discussion on inner/outer packaging for waste:

Issue	Proposal 1	Proposal 2	Proposal 3	Proposal 4
Max. volume of inner packaging	4.1.10?	Alternative proposal?		
UN-tested of inner packaging (>LQ)	X?	Y?	No?	
Absorbants	Vermiculite	Sand	Sawdust?	...

ADR combined classes: limitations				
Excluded ADR-classes above the limitations due to the UN-test of the outer packaging	2?	1?	6.2	...
Max. volume of outer packaging	60 liters	120 liters	220 liters	800 liters (ASP/IBC)
UN-testing	X?	Y?		
...				

- FEAD is also preparing for the meeting a table summarizing differences between materials having commercial status or waste status.