

7th meeting of the Informal Working Group on the Transport of Hazardous Waste

30 May 2023

9h30 – 13h30

Technical practicalities

For an efficient and clear meeting

House rules

Technical practicalities

- Keep your microphone muted; activate it only if you want to talk;
- Camera is optional; if connection is bad, it is advisable to switch it off;
- If you want to talk, raise your hand (TEAMS icon);
- Subtitles will be activated (English only).



Organizational practicalities

- Keep your intervention structured and clear (target max 90 sec.);
- Use the chat function for short communications;
- Ask the moderator if you want to share documents/screen.



Tour de table

Who is participating

Proposed agenda

Agenda Item		Action	Time (approx.)
Welcome coffee and opening of online participation			9h00-9h30
Introduction	Opening of the meeting: presentation of the protocol to guarantee a quality hybrid meeting.	Information	9h30-9h45
	Tour de table	Information	
	Approval of the proposed agenda – AOB?	Adoption	
	Short recap of previous meetings	Information	
ECE-TRANS-WP.15-AC.1-2023-19	Chemical compatibility for plastics packaging containing liquid waste	Presentation of the proposal	9h45-11h15
		Presentation of the proposed solutions (ECE-TRANS-WP15-AC1-2023-BE-INF.41)	
		Discussion and finalisation of updated WD proposal	
Comfort and coffee break			11h15-11h30
ECE-TRANS-WP.15-AC.1-2023-20	Transport of packaged waste in combination packaging	Presentation of the proposal and comments received during JM	11h30-13h15
		Considerations on ECE-TRANS-WP15-AC1-2023-BE-INF.29 – consider 2 different provisions: known/unknown composition of the waste	
		Discussion and finalisation of updated WD proposal	
AOB	2 Documents from IE for consideration of the IWG	Short introduction and decision on further actions	13h15-13h30
End of the meeting			

Summary previous Informal WG

See meeting Report

- **1st IWG meeting (02-03 April 2019, Brussels)**
 - Proposed the list of issues to consider, which was then approved by the JM in its 2019 autumn session.
- **2nd IWG meeting (03-04 March 2020, Utrecht)**
 - Dealt with the first 10 issues from the selected list. This resulted in the submission of several working documents to the 2020 autumn session of the Joint Meeting.
- **3rd IWG meeting (07 October 2020, Online)**
 - Fine-tuning of the documents discussed and supported during the 2020 autumn JM.
- **4th IWG meeting (19 November 2020, Online)**
 - Principally two new issues (Issue 2.2: “transport of packaged waste – inner packagings packed together” and Issue 2.5: “chemical compatibility”) were addressed.
- **5th IWG meeting (15 and 16 June 2022, The Hague & online)**
 - Discussions on issues 2.2 (combined packaging) and 2.5 (chemical compatibility for single plastic packaging) after which FEAD submitted a proposal to the JM for further feedback in September 2022 (INF doc) and in March 2023 (WD).
 - Progress was also made on issue 5.2 (presence of hazardous household waste in the (selective) collection of non-hazardous waste (e.g. empty packaging)) and on the transport of asbestos in bulk, the latter of which will be further discussed in a dedicated meeting in November 2022.
- **6th IWG meeting (16 November 2022, Brussels & online)**
 - Dedicated to the carriage of asbestos waste in bulk. The IWG is working on a common solution in the ADR in view of the different national interpretations of the existing Special Provision 168.

Chemical compatibility for plastics packaging containing liquid waste

Chemical compatibility for plastics packaging containing liquid waste

Context

- FEAD stresses the need to introduce rules regarding the chemical compatibility of plastic packagings containing liquid waste when the exact composition of such waste is not known. For example, when there is a collection of different liquid wastes from laboratory tests or analyses in a drum, the drum may contain various solvents, and one does not know in advance the exact composition of each drum.
- The rule for collective entries (figure ADR 4.1.1.21.2) requires the exact composition of the waste to be known. In most cases, it leads to a declaration of “further testing requested”, which means it will be stored at room temperature for 6 months or on a test piece for 3 weeks under conditions, which is in practice inapplicable for waste.
- Rules concerning compatibility for chemical packaging were simpler and more practical in ADR 2001.
- The sole national derogation dealing with this issue is Ausnahme 20 in Germany. This derogation is based on “Abfallgruppen” (waste groups), and not on UN numbers.
- Such an approach could be inspiring for the ADR. After consultation with the IWG and further feedback from the JM, FEAD proposes 2 options.

Chemical compatibility for plastics packaging containing liquid waste

Proposal submitted to the March 2023 JM (WD 19):

5. To ensure the highest level of safety possible, we propose that the material of the packaging has been tested with all the six standard liquids for the verification of the chemical compatibility of plastic packaging, and that the packaging itself conforms to the packaging group I performance level.

Proposal

6. Following discussions within the informal working group on the Transport of Hazardous Waste at the meeting held on 15 and 16 June 2022 in The Hague (and online), FEAD suggests adding:

Under 4.1.1.21.7 the following paragraph:

“Liquid waste classified under 2.1.3.5.5 shall be filled into plastic packaging only provided that the packaging material passes the tests with all the six standard liquids described in 6.1.6.1. Packaging shall conform to the packing group I performance level.”

Justification

7. This proposal clarifies the situation faced in waste management and does not increase the current risk level.

Chemical compatibility for plastics packaging containing liquid waste

Discussion in the March 2023 JM (WD 19):

- Strong preference for PG I
 - Problem of market availability
- Strong preference for PG II because already used at national level

Standardflüssigkeit Standard liquid	Dampfdruck (absolut) vapour pressure (absolute) [kPa]		Verpackungsgruppe packaging group Dichte / density [kg/l]		
	50°C	55°C	I	II	III
Wasser / water	200	233	1,9	1,9	1,9
Netzmittellösung / wetting solution	171	200	-	1,2	1,2
Kohlenwasserstoffgemisch (White spirit) / mixture of hydrocarbons (white spirit)	171	200	-	1,0	1,0
Essigsäure / acetic acid	171	200	-	1,4	1,4
Salpetersäure 55% / nitric acid 55%	171	200	-	1,4	1,4
n-Butylacetat / mit n-Butylacetat gesättigte Netzmittellösung / normal butyl acetate / normal butyl acetate-saturated wetting solution	143	166	-	1,2	1,2

- Proposed solutions:
 - PG I tested with water and PG II for the rest of liquids
 - Focus on chemical compatibility because the PG is already regulated in 2.1.3.5.5

Chemical compatibility for plastics packaging containing liquid waste

2 options after discussion in the March 2023 JM (INF.24):

Under 4.1.1.21.7 the following paragraph:

Option 1: “In derogation of 4.1.1.21.1, liquid waste classified under 2.1.3.5.5 shall be filled into plastic packaging **only** provided that the packaging passes the tests with all the standard liquids described in 6.1.6.1. Packaging shall conform to the packing group performance level as assigned by 2.1.3.5.5.”

Option 2: “In derogation of 4.1.1.21.1, liquid waste classified under 2.1.3.5.5 shall be filled into plastic packaging **only** provided that the packaging passes the tests with all the standard liquids described in 6.1.6.1 for packing group II. If the liquid waste is classified as packing group I, the packaging shall additionally pass the test for performance level packing group I with water.”

Comfort Break ~ 15 minutes

Transport of packaged waste in combination packaging

Transport of packaged waste in combination packaging

Context

- FEAD stresses the need to introduce a solution to carry waste in combination packaging where the existing rules are not sufficient to cover all the possible variations encountered in the waste management reality.
- Original products are packed in a combination packaging, specifically tested for that purpose (see ADR 6.1.5). For waste collection, often only the inner packaging remains available. This waste must be sorted, according to its hazardous properties, and be repacked fulfilling all the requirements of the ADR, which is not possible. There is a lack of a simple legal solution available to replace the missing outer packaging.
- The options foreseen under 4.1.1.5.1 and even the provisions in 6.1.5.1.7 are too strict for the waste management because the existing variations of inner packaging are much wider as those foreseen under 4.1.1.5.1 or the packaging cannot be correctly used in accordance with the certification under 6.1.5.1.7. Also, for safety and economic reasons it is not realistic to repack each single packaging containing waste individually.
- In the absence of easily workable rules in the ADR, a number of countries have developed national derogations to take account of the specificity of the waste, and it was decided that the IWG on waste should work on harmonised rules for the ADR that could then be adapted in each country.

Packaged waste



Overview of used outer packagings (1)



Overview of used outer packagings (2)



Overview of used outer packagings (5)



IBC 11H2



Small hazardous
waste box



Overview of used outer packagings (6)

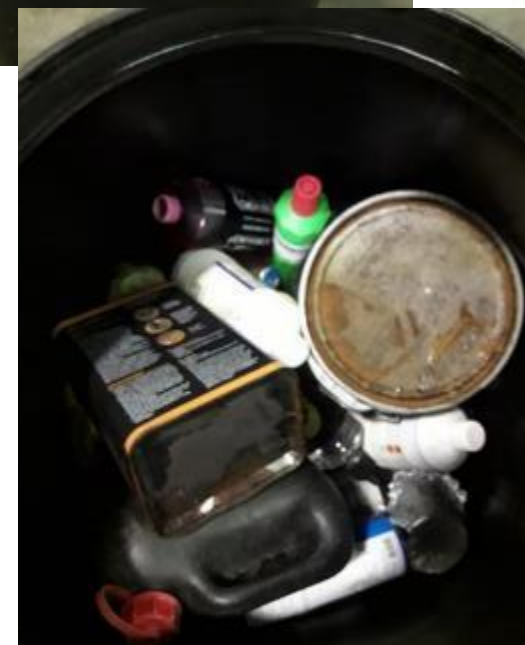


Outer
receptacles



Overview of used outer packagings (3)

UN-tested
open drum



UN-tested
big bags



Overview of used outer packagings (7)



Safety truck



Waste drums
inside safety
truck

Transport of packaged waste in combination packaging

Comments on WD 20 submitted by the Government of Ireland to the March 2023 JM

Introduction

1. Ireland supports this proposal from the European Federation of Waste Management and Environmental Services (FEAD) in principal, as it serves to provide progress in finding a solution for the carriage of waste in combination packaging. We agree that the existing provisions in RID/ADR do not cover all possible variations encountered in the carriage of packaged waste in combination packaging. However, Ireland is of the opinion that the proposal may need some further development in order to solve this ongoing issue.
2. In Ireland, we have had national competent authority exemptions in place for ‘laboratory smalls’ since 2011. The original exemption was granted in response to practical difficulties experienced by the waste industry in Ireland in achieving compliance with some of the provisions of the ADR.
3. During 2015, our stakeholders sourced suitable “V” marked packaging that meets the requirements of ADR 6.1.5.1.7 which allows articles or inner packagings of any type for solids or liquids (for example “laboratory smalls”) to be assembled in outer packaging without testing in combination.
4. Ireland’s current ‘laboratory smalls’ exemption permits substances or articles with different UN numbers, where several are packaged together in a single package, to be classified under one or more suitable UN number(s) according to collective entries as defined in ADR 2.1.1.2. This collective entry is marked on the outer package, which is tested, approved and marked in accordance with ADR 6.1.5.1.7. Except where provided otherwise in ADR 4.1.10, the exemption allows “laboratory smalls” to be packed together up to a maximum of 5 kg or 5 L per individual inner package under the provisions of the exemption.
5. The Irish competent authority consulted with stakeholders in relation to the proposal in document ECE/TRANS/WP.15/AC.1/2023/20, and includes feedback from stakeholders in the comments below.

Transport of packaged waste in combination packaging

Comments on WD 20 submitted by the Government of Ireland to the March 2023 JM

Difficult to cover in the same provision

- Waste where the composition is **not precisely known** (e.g. from waste facilities)
- Waste where the composition is **precisely known** (e.g. waste from laboratories)

→ Consider two separate provisions (e.g. 4.1.1.5.3.1 and 4.1.1.5.3.2)

- More clarity and less complexity

Transport of packaged waste in combination packaging

Updated proposal (WD 20 submitted to the March 2023 JM)

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, 20-24 March 2023

Item 5 (b) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:
new proposals**

Transport of packaged waste in combination packaging

**Transmitted by the European Federation of Waste Management and
Environmental Services (FEAD)* ****

Summary

Executive summary:	This document considers the need to introduce a solution to carry waste in combined packaging where the existing rules are not sufficient to cover all the possible variations encountered in the waste management reality, in which often only the inner packagings are available, and a suitable outer packaging has to be added.
Action to be taken:	Introduce a new 4.1.1.5.3.

AOB, conclusions & next steps

AOB, conclusions & next steps

- **AOB**
 - 2 documents proposed by Ireland
 - Carriage of empty packaging waste
 - New UN numbers for waste
- **Conclusions and next steps**
 - FEAD will update the documents on packaging according to the discussions today
 - Deadline to submit WD: **23 June 2023**
- **Planning of next meeting**

**Thank you for
your attention**