

8th meeting of the Informal Working Group on the Transport of Hazardous Waste

8 February 2024

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

Proposed agenda

Agenda Item		Action	Time (approx.)
Welcome coffee and opening of online participation			9.00-9.30
Introduction	Opening of the meeting: presentation of the protocol to guarantee a quality hybrid meeting.	Information	9.30-9.45
	Tour de table	Information	
	Approval of the proposed agenda – AOB?	Adoption	
	Short recap of previous meetings	Information	
ADR 2025	Multilateral agreement for asbestos and packaging provisions	Discussion	9.45-10.00
List of issues	Recap and reprioritisation of files	Discussion and decision	10.00-11.15
Comfort and coffee break			11.15-11.30
Revision of provisions	Rule of estimated quantities	Recap & discussion on identified limitations	11.30-12.30
		Updates for 2025	
		Further revision & INF doc for discussion	
Revision of provisions	Carriage of empty uncleaned packaging	Presentation of the document by IE & discussion	12.30-13.30
AOB	Carriage of solid waste contaminated with DG under the bulk provisions of UN 3175	Presentation of 2 IE national exemptions & request for feedback from the IWG	
End of the meeting			

Version of 31 January 2024

Summary previous IWG meetings

Meeting documents can be found at <https://fead.be/adr/>





Economic and Social Council

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18 October 2018

English

Original: English and French

C. Transport of hazardous waste

Informal document: INF.4 (FEAD)

62. There was general support for the establishment of an informal working group led by FEAD. As a first step, the Joint Meeting requested the representative of FEAD to prepare a list of the issues, including a description of the legal and factual situation in each case, that need to be addressed and to circulate it for comments to all those who expressed interest in participating in the work, well in advance of the first meeting of the informal working group. A document compiling all comments received should be submitted to a future session of the Joint Meeting for examination, and the Joint Meeting would consider at that time the most appropriate way to deal with them.

Summary of previous IWG meetings

- **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, with a recommendation to include the carriage of used pressure receptacles such as aerosols and gas cartridges in bulk.
- **2nd IWG meeting (03-04 March 2020, Utrecht)**
 - Prioritisation of list of issues and work on 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.
 - UN 3509 in sheeted bulk containers – AC1/2020/62
 - Clarification empty, uncleaned packagings/UN3509 – AC1/2020/60
 - Quantity of waste transported in the transport document - AC1/2020/60
 - Carriage of polymerizing substances as waste - AC1/2020/51
- **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 issues (“transport of packaged waste – inner packagings packed together” and “chemical compatibility”) were addressed.

Summary of previous IWG meetings

- **5th IWG meeting (15 and 16 June 2022, The Hague & online)**
 - Discussions on issue 2.2, *combination packaging* and issue 2.5, *chemical compatibility for single plastic packaging* after which FEAD submitted a proposal to the JM for further feedback.
 - 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*.
- **6th IWG meeting (16 November 2022, Brussels & online) – asbestos**
 - Dedicated to the carriage of asbestos waste in bulk. The IWG worked on a common solution in the ADR in view of the different national interpretations of the existing Special Provision 168.
 - **Proposal was approved end of 2023 and will be in ADR 2025.**
- **7th IWG meeting (30 May 2023, Brussels & online) – packaging**
 - Dedicated to the *chemical compatibility of plastics packaging containing liquid waste* and to the *transport of waste in inner packagings packed together in an outer packaging*. The IWG discussed and fine-tuned the proposals to be submitted by FEAD to the autumn session of the Joint Meeting.
 - **Both documents were approved end of 2023 and will be in ADR 2025.**

New rules for waste DG in 2025

New rules for waste DG in ADR 2023

- Rule of **estimated quantities**, paragraph 5.4.1.1.3.2
- Carriage of **polymerizing substances** as waste, Special Provision 676
- Transport of UN 3509 in sheeted bulk containers or vehicle (and not only closed), new instruction VC1 in column 17 of table A for UN3509
- Discarded, empty, uncleaned packagings (UN 3509)” – Clarification for class 5.1 in Special Provision 663

New rules for waste DG in ADR 2025

- Exemption for **carriage of dangerous goods as waste by private individuals**, paragraph 1.1.3.1
- Inclusion of **water-based paints** under Special Provision 650
- Possibility to carry **liquid waste**, whose composition is not exactly known, **in plastic packaging without having to apply the ‘further testing’ requirements of the rule for collective entries**, new paragraph 4.1.1.21.7
- Extension of the rule for **estimated quantities** in transport documents **to clinical or (bio)medical waste**, paragraph 5.4.1.1.3.2
- Possibility to carry **asbestos waste in bulk** outside Special Provision 168, new Special Provision 678, new paragraph 5.4.1.1.4, new AP 12, and new CW 38
- Possibility to carry waste, other than articles, **in inner packagings of different sizes and shapes, containing liquids or solids, together in one outer packaging**, new paragraph 4.1.1.5.3 and new paragraph 5.4.1.1.3.3
- Extension of the **definition of ‘recycled plastic material’** will be extended to allow also plastic material other than plastic from industrial packagins as a source, in line with the new UN Model Regulations Rev. 23 (2023)

New rules for waste DG in ADR 2025

- Exemption for carriage of dangerous goods as waste by private individuals, paragraph 1.1.3.1
- Inclusion of water-based paints under Special Provision 650
- **Possibility to carry liquid waste, whose composition is not exactly known, in plastic packaging without having to apply the 'further testing' requirements of the rule for collective entries, new paragraph 4.1.1.21.7**
- Extension of the rule for estimated quantities in transport documents to clinical or (bio)medical waste, paragraph 5.4.1.1.3.2
- **Possibility to carry asbestos waste in bulk outside Special Provision 168, new Special Provision 678, new paragraph 5.4.1.1.4, new AP 12, and new CW 38**
- **Possibility to carry waste, other than articles, in inner packagings of different sizes and shapes, containing liquids or solids, together in one outer packaging, new paragraph 4.1.1.5.3 and new paragraph 5.4.1.1.3.3**
- Extension of the definition of 'recycled plastic material' will be extended to allow also plastic material other than plastic from industrial packagings as a source, in line with the new UN Model Regulations Rev. 23 (2023)

Multilateral Agreement until 2025?

Next priorities of the IWG on the transport of waste DG

Documents 1 - 5



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Next priorities of the IWG on the transport of waste DG

1. April 2019: original **list of issues proposed by FEAD** with a description of the problem
→ **25 issues are identified** by FEAD experts and presented to the 1st IWG meeting



2. April 2019: the 1st IWG meeting **discusses the list of issues and makes a selection**
(see Annex to ECE/TRANS/WP.15/AC.1/2019/34)
→ **15 issues are selected** and presented to the JM in autumn

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods
Geneva, 17-27 September 2019
Item 7 of the provisional agenda
Reports of informal working groups

**Informal working group on the transport of hazardous
waste: meeting in Brussels (02 to 03 April 2019)**

Next priorities of the IWG on the transport of waste DG

3. October 2019: the **Joint Meeting** noted the information and **adopted the list of issues** to be considered by the group in future **as reflected in the annex to ECE/TRANS/WP.15/AC.1/2019/34** (see report ECE/TRANS/WP.15/AC.1/156)

- The Joint Meeting recommended that the carriage of used pressure receptacles such as aerosols and gas cartridges in bulk be added to the list.
- It was agreed that the informal working group should follow a pragmatic approach and consider first issues of high importance which could result in potential amendments for the 2023 editions of RID/ADR/ADN, but also issues that could easily be resolved.

United Nations

ECE/TRANS/WP.15/AC.1/156



Economic and Social Council

Distr.: General
14 October 2019

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

**Report of the Joint Meeting of the RID Committee of Experts
and the Working Party on the Transport of Dangerous
Goods on its autumn 2019 session***

held in Geneva from 17–26 September 2019

Next priorities of the IWG on the transport of waste DG

4. March 2020: 2nd IWG meeting discusses selected issues on the list and makes a prioritisation considering its importance and the easiness
- 15 issues were selected by IWG + 1 recommended by the JM = **16 issues selected**
 - **10** of which are **prioritised** (4 doc submitted to JM)
 - JM March 2020 refers a new topic to the IWG after doc from Finland (ECE/TRANS/WP.15/AC.1/2020/2) - waste batteries / used storage batteries, carriage in bulk (AP8)

Subject Number	Title
2	Packaging / Marking - labelling
2.1	Household dangerous waste collection
2.2	Transport of packaged waste: inner packagings packed together
2.3	Chemical compatibility
2.4	"Empty uncleaned packaging" or "discarded, empty, uncleaned packagings (UN 3509)" Clarification of the scope
3	Bulk / Tanks / Placarding, orange plate marking
3.1	Transport of large volumes of asbestos contaminated objects or soil in bulk

3.2	Transport of UN 3509 in sheeted bulk containers or vehicle (and not only closed)
3.3	Transport of aerosols and gas cartridges in bulk
4	Documentation / Transport / Responsibility
4.1	Quantity of waste transported in the transport document
6	Specific topic
6.1	Carriage of polymerizing substances as waste
6.2	Presence of hazardous household waste in the (selective) collection of non-hazardous waste (e.g. empty packaging).

Next priorities of the IWG on the transport of waste DG

5. February 2024: What is the current status of the list of issues

→ 10 issues prioritised by the 2nd IWG meeting (in order of prioritisation)

Order	Issue	Status
1	Quantity of waste transported in the transport document	5.4.1.1.3.2 in ADR 2023. Further discussion needed?
2	Transport of UN 3509 in sheeted bulk containers or vehicle (and not only closed)	ADR 2023
3	“Empty uncleaned packaging” or “discarded, empty, uncleaned packagings (UN 3509)” – Clarification of the scope and definition of empty	SP 663 modified in ADR 2023 for class 5.1. Further discussion needed to clarify scope.
4	Household dangerous waste collection	Solved with issue below and to be completed with national rules
5	Transport of packaged waste: inner packagings packed together	ADR 2025
6	Presence of hazardous household waste in the (selective) collection of non-hazardous waste (e.g. empty packaging).	INF docs discussed in IWG and JM.
7	Carriage of polymerizing substances as waste	SP 676 in ADR 2023
8	Chemical compatibility	ADR 2025
9	Transport of large volumes of asbestos in bulk	ADR 2025
10	Transport of aerosols and gas cartridges in bulk	AT to make a proposal

Next priorities of the IWG on the transport of waste DG

5. February 2024: What is the current status of the list of issues

→ **6 issues that were not prioritised** by the 2nd IWG meeting (see 4. document, report of the meeting, and 1. document for the description of the problem)

- ❖ Exemption of pharmaceutical products (medicines) ready for use – issue 1.1 (1.2)
- ❖ Criteria for hazardous waste differ from the criteria for dangerous goods – issue 1.2 (1.4)
- ❖ Unidentified waste – issue 1.3 (1.5)
- ❖ **Reuse of packaging – issue 2.3**
 - **To discuss together with empty unclean packaging/UN3509**
- ❖ Packagings of medical waste – issue 2.6 (2.10)
- ❖ For class 6.2, in addition to the information concerning the consignee, the name and telephone number of a responsible person shall be indicated – issue 4.2 (4.3)
 - Modifications of orange book very difficult

Next priorities of the IWG on the transport of waste DG

5. February 2024: What is the current status of the list of issues

→ **9 issues that were not selected** by the 1st IWG meeting (see 2. document, Annex to ECE/TRANS/WP.15/AC.1/2019/34, and 1. document for the description of the problem)

- ❖ Exemption of lamp containing dangerous goods – issue 1.1
- ❖ Exemption for emergency procedure – issue 1.3
- ❖ Exemption for uncleaned empty packaging: definition of empty packaging? – issue 1.6
- ❖ **Packaging or IBC which are expired – issue 2.4**
- ❖ Environmentally hazardous substance mark – issue 2.5
- ❖ Salvage packaging can be used for damaged, defective, leaking or non-conforming packages. Use of a larger size packaging, an IBC of type 11A or a large packaging is permitted under certain condition – issue 2.7
 - Solved with 4.1.1.19
- ❖ Digitalisation of transport document if specific waste legislation traceability document is used – issue 4.1
- ❖ Is the waste producer always the consignor? In chapter 1.4, the consignor has many obligations – issue 4.4
- ❖ Specific training for the transport of waste? – issue 5.1

The inclusion of this issue is **temporarily not selected**.

Next priorities of the IWG on the transport of waste DG

5. February 2024: What is the current status of the list of issues

→ Proposed prioritisation

- **Finalise pending issues**
 - ❖ Estimated quantities
 - ❖ Empty uncleaned packaging/UN3509
 - ❖ **Carriage of batteries in bulk** (ECE/TRANS/WP.15/AC.1/2020/2)
- **Not started, prioritised issues**
 - ❖ **Household HW**
- **Non-prioritised issues**
 - ❖ Solved/no solutions envisaged at ADR level/no longer relevant
- **Temporarily non-selected issues**
 - ❖ Solved/no solutions envisaged at ADR level/no longer relevant
- **Not selected issues?**
 - ❖ ~~Specific training on waste for drivers~~ (not only control)

Comfort Break ~ 15 minutes

Rule of estimated quantities

Document No 7

Rule of estimated quantities

5.4.1.1.3.2 If it is not possible to measure the exact quantity of the waste at the place of loading, the quantity according to 5.4.1.1.1 (f) may be estimated for the following cases under the following conditions:

- (a) For packagings, a list of packagings including the type and the nominal volume is added to the transport document;
- (b) For containers, the estimation is based on their nominal volume and other available information (e.g. type of waste, average density, degree of filling);
- (c) For vacuum-operated waste tanks, the estimation is justified (e.g. by means of an estimation provided by the consigner or by vehicle equipment).

Such estimation of the quantity is not allowed for:

- Exemptions for which the exact quantity is essential (e.g. 1.1.3.6);
- Waste containing substances mentioned in 2.1.3.5.3 or substances of Class 4.3;
- Tanks other than vacuum-operated waste tanks.

A statement shall be included in the transport document, as follows:

"QUANTITY ESTIMATED IN ACCORDANCE WITH 5.4.1.1.3.2".

Rule of estimated quantities

Context – INF.35 September 2023

INF.35

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

20 September 2023

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

Geneva, 19–27 September 2023

Item 6 of the provisional agenda:

Interpretation of RID/ADR/ADN

**Information on the estimated quantity for waste transported
in the transport document in accordance with 5.4.1.1.3.2**

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

1. In document ECE/TRANS/WP.15/AC.1/2023/48, the Government of Ireland introduced an amendment to extend the scope of 5.4.1.1.3.2 to the quantity of medical and clinical waste (UN 3291).
2. FEAD would like to take the opportunity of this document about paragraph 5.4.1.1.3.2 to have a discussion with the delegates about another restriction of the scope of this paragraph.
3. Transport of waste in tanks other than vacuum-operated tanks has been excluded from the scope of 5.4.1.1.3.2.
4. Since the introduction of paragraph 5.4.1.1.3.2 in ADR 2023, we have been informed by waste operators that in some cases, only an estimated quantity is available even for the transport in tanks other than vacuum operated tanks. This is the case, for example, when waste oils are collected in garages. In such cases, estimation can be easily made with the availability of the degree of filling.
5. Paragraph 5.4.1.1.3.2 was introduced in ADR 2023 to take into account that for waste, in some cases, the quantity transported can only be estimated.
6. In the first discussion, transport of waste in tanks other than vacuum-operated tank were not excluded (ECE/TRANS/WP.15/AC.1/2021/18 and informal document INF.26 (Spain) and INF.27 (FEAD) of the spring session of the Joint Meeting in Bern (15-19 March 2021)).
7. Initial justification was that for tanks, other than vacuum-tanks, enough information on the degree of filling shall be available to allow the estimation. For vacuum-operated tanks, the estimation shall be justified.
8. In INF.42 (FEAD), document proposed during the Joint Meeting to take into account the current discussion, transport of waste in tanks other than vacuum-operated was excluded from the scope.
9. FEAD wanted to ask the delegates if this limitation of the scope could be reconsidered to allow the indication of estimated waste quantities in the transport documents also for transports in tanks, other than vacuum-tanks.

Rule of estimated quantities

Context – Report JM autumn 2023, ECE/TRANS/WP.15/AC.1/170

D. Information on the estimated quantity for waste transported in the transport document in accordance with 5.4.1.1.3.2

Informal document: INF.35 (FEAD)

56. Most delegates who took the floor agreed on the need to review the provisions in 5.4.1.1.3.2 to allow an indication of estimated quantities in the transport document also in the case of carriage of waste in tanks. The representative of FEAD volunteered to prepare an official document. Referring to document ECE/TRANS/WP.15/AC.1/2023/48 (see paragraph 25 above), the representative of Ireland offered to work together with FEAD on a joint proposal for consideration at the next session.

Rule of estimated quantities

2024 proposal by IE (doc no 7)

If it is not possible to measure the exact quantity of the waste at the place of loading, the quantity according to 5.4.1.1.1 (f) may be estimated for the following cases under the following conditions:

- (a) For packagings, a list of packagings including the type and the nominal volume is added to the transport document;
- (b) For containers, the estimation will be based on their nominal volume and other available information (e.g. type of waste, average density, degree of filling);
- (c) For **tanks and** vacuum operated waste tanks, the estimation shall be justified (e.g. by means of an estimation provided by the consigner or by wagon/vehicle equipment).

Such estimation of the quantity is not allowed for:

- Exemptions for which the exact quantity is essential (e.g. 1.1.3.6);
- **Waste containing substances of Class 1**
- **Waste containing substances of Class 7**
- ~~Waste containing substances mentioned in 2.1.3.5.3 (with the exception of UN No. 3291, medical or clinical waste, in packaging conforming to P621) or substances of Class 4.3;~~
- ~~Tanks other than vacuum operated waste tanks.~~

A statement shall be included in the transport document, as follows:

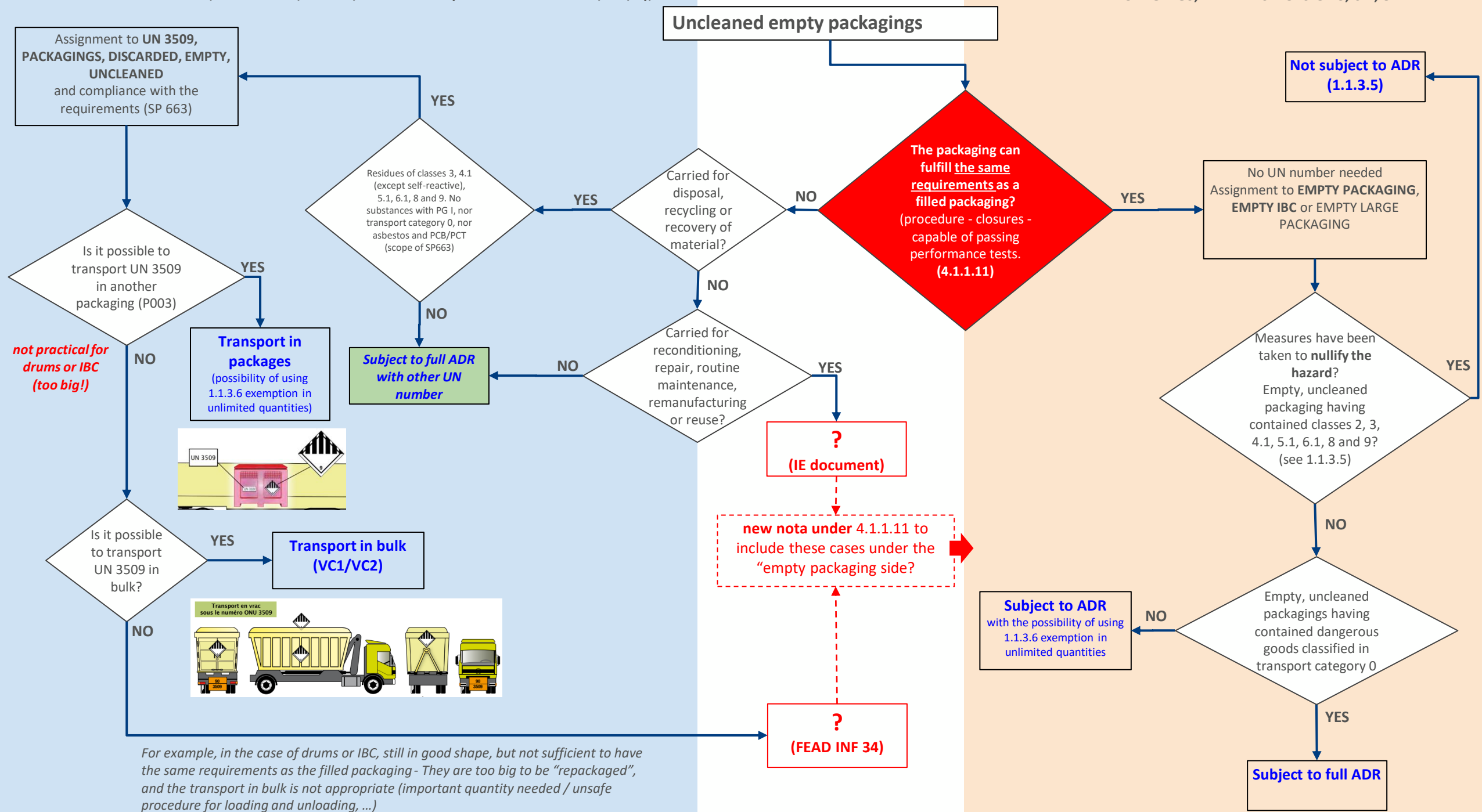
“QUANTITY ESTIMATED IN ACCORDANCE WITH 5.4.1.1.3.2”.

Carriage of empty uncleaned packaging

Document No 6

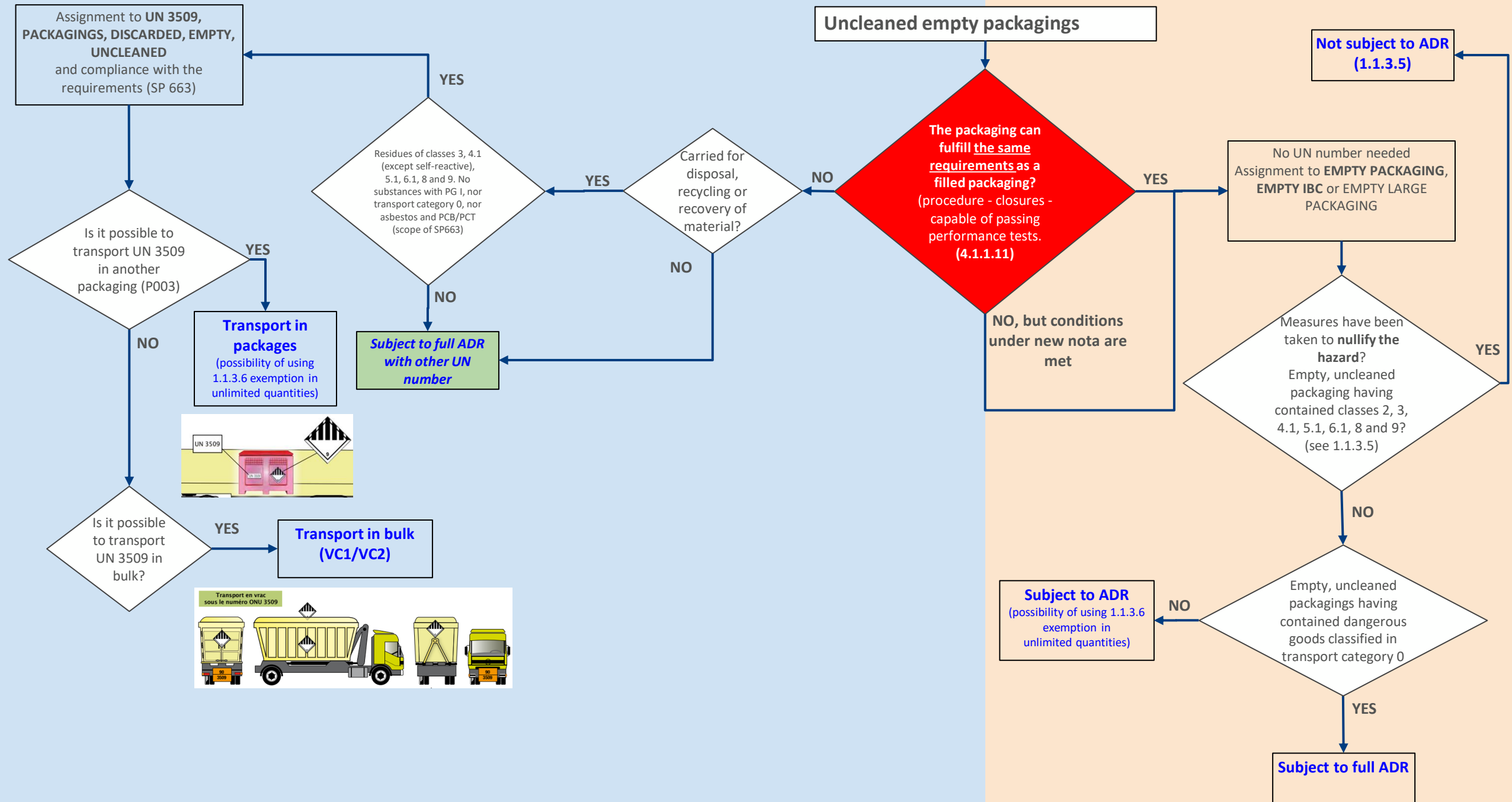
UN 3509 PACKAGINGS, DISCARDED, EMPTY, UNCLEANNED (WITH RESIDUES OF 3, 6.1, 8), 9.

EMPTY PACKAGINGS, WITH RESIDUES OF 3, 6.1, 8.



UN 3509 PACKAGINGS, DISCARDED, EMPTY, UNCLEANNED (WITH RESIDUES OF 3, 6.1, 8), 9.

EMPTY PACKAGINGS, WITH RESIDUES OF 3, 6.1, 8.



Carriage of empty uncleaned packaging

Clarification of scope

UN 3509 PACKAGINGS, DISCARDED, EMPTY, UNCLEANED (WITH RESIDUES OF 3, 6.1, 8), 9.

This kind of damaged packagings as to be considered as a whole :

- either these damaged packagings (with their original labels) has to be “repackaged (P003). The class 9 label and UN 3509 marking is on the “outer” packaging.



- either they can be transported in bulk. The class 9 label is on the container with orange plate (90/3509)



Carriage of empty uncleaned packaging

Clarification of scope

EMPTY PACKAGINGS, WITH RESIDUES OF 3, 6.1, 8.

These empty packagings are transported as a package (not in bulk) with no “outer” packagings.

The original labelling is still on the packaging.



Carriage of empty uncleaned packaging

Clarification of scope

The wrong interpretation of UN 3509 :

- These empty drums either they are transported in another packaging (with the class 9 label), either they are transported in bulk (and the class 9 label is on the container)
- The class 9 label and UN 3509 marking can't be on the the empty packaging directly (or only if it is used as an “outer packaging” with damaged packagings inside, UN 3509 is then assigned to these damaged packagings as a whole).

These empty packagings are not compliant with 4.1.1.11 : they do not fulfill the same requirements as those for a filled packaging

They could be transported as “Empty packaging” with a new nota under 4.1.1.11?



Carriage of empty uncleaned packaging

2024 updated draft INF document by IE (document nr. 6)

4.1.1.11

Empty packagings, including IBCs and large packagings, that have contained a dangerous substance are subject to the same requirements as those for a filled packaging, unless adequate measures have been taken to nullify any hazard.

***NOTE:** When such packagings are carried for disposal, recycling or recovery of their material, they may also be carried under UN 3509 provided the conditions of special provision 663 of Chapter 3.3 are met.*

The IE CA considers that for certain types of waste packaging that is empty and uncleaned, compliance with this provision can be difficult with respect to

- taking measures to nullify the hazard, and
- the use of classification UN3509 to carry the empty uncleaned packaging.

Carriage of empty uncleaned packaging

2024 updated draft INF document by IE (document nr. 6)

4.1.1.11 Empty packagings, including IBCs and large packagings, that have contained a dangerous substance are subject to the same requirements as those for a filled packaging, unless adequate measures have been taken to nullify any hazard.

***NOTE:** When such packagings are carried for disposal, recycling or recovery of their material, they may also be carried under UN 3509 provided the conditions of special provision 663 of Chapter 3.3 are met.*

If measures have not been taken to nullify the hazard, and the classification of UN 3509 is not possible, then empty uncleaned packagings are subject to the same requirements as those for a filled packaging.

These empty uncleaned packagings are thus required to comply with the document requirements of provisions 4.1.1.1, 4.1.1.3, 6.1.1.5, 6.1.5.8.2, 6.5.1.1.4 and 6.5.6.14.2 (listed in Annex 1 on the last page of this document).

The IE CA has issued a national exemption in response to this difficulty.

Carriage of empty uncleaned packaging

2024 updated draft INF document by IE (document nr. 6)

Options for proposal:

Option 1

- Do nothing – retain provisions 4.1.1.11, and the provisions for UN 3509 as they are currently worded in RID/ADR/ADN.
- Some stakeholders in the waste industry in Ireland have developed procedures to overcome the difficulties experienced in meeting the provisions of 4.1.1.11.

Option 2

- Propose some provisions that will make it easier for the waste industry to use the classification of UN 3509, as follows:
 - Amend SP 663 to permit waste packaging carried for the purpose of re-conditioning?
 - Amend P003 and RR9 (and IBC08/BB3 and LP02/LL1) to provide further clarity regarding the provisions for UN3509?
 - To provide guidance on how packaging classified as UN 3509 can be carried in bulk?

Option 3

- If option 1 and option 2 are not favoured, develop a proposal to amend 4.1.1.11, as provided below.

Carriage of empty uncleaned packaging

2024 updated draft INF document by IE (document nr. 6)

Options for proposal:

Option 3

- If option 1 and option 2 are not favoured, develop a proposal to amend 4.1.1.11, as provided below.

4.1.1.11: Empty packagings, including IBCs and large packagings, that have contained a dangerous substance are subject to the same requirements as those for a filled packaging, unless adequate measures have been taken to nullify any hazard.

NOTE 1: When such packagings are carried for disposal, recycling or recovery of their material, they may also be carried under UN 3509 provided the conditions of special provision 663 of Chapter 3.3 are met.

NOTE 2: If the packaging documentation required by 4.1.1.1, 4.1.1.3, 6.1.1.5, 6.1.5.8.2, 6.5.1.1.4 and 6.5.6.14.2 is not available for the empty uncleaned packaging used for the carriage of Classes 3, 4.1, 6.1, 8 and 9, it may be carried if the empty, uncleaned, packaging has minimal residue of free liquid or solids, and if written procedures are developed for alternative packaging closure methods. Such procedures shall include the use of the original component parts, packaging closure devices and measures taken to ensure packaging remains firmly closed so that it remains leakproof during the normal conditions of carriage. The clamp band securing method on removable head drums may be replaced with an equivalent securing device where necessary. Such alternative packaging closure methods shall not be used for large packagings, dangerous goods with packing instructions that specify the packaging to be hermetically sealed or vented or to packagings that had contained dangerous goods excluded from the scope of special provision 663 of Chapter 3.3.

AOB, conclusions & next steps

AOB, conclusions & next steps

- **AOB**

Carriage of solid waste contaminated with dangerous goods under the bulk provisions of UN 3175. Two national exemptions in IE to allow carriage in bulk of solid wastes (e.g. liners, PPE, wipes etc.) contaminated with dangerous goods, including solvents, raw materials and API's (Active Pharmaceutical Ingredients) from pharmaceutical and medical device industries, as follows:

1. for waste under the classification of UN 3175, SOLIDS or mixtures of solids (such as preparations and wastes) CONTAINING FLAMMABLE LIQUID, N.O.S. having a flash point up to 60°C, with additional hazard communication to reflect an additional toxic hazard, and
2. for waste under the classification of UN 3175, SOLIDS or mixtures of solids (such as preparations and wastes) CONTAINING FLAMMABLE LIQUID, N.O.S. having a flash point up to 60°C, with additional hazard communication to reflect an additional corrosive hazard.

Request for feedback of the IWG to ascertain if similar provisions are needed by the waste industry in other Contracting Parties.

AOB, conclusions & next steps

- **Conclusions and next steps**
 - FEAD will draft the minutes and submit a report to the JM according to the discussions of the IWG
 - IE and FEAD to submit INF docs?
- **Planning of next meeting**

**Thank you for
your attention.**