

**Economic and Social Council**Distr.: General  
2 January 2025

Original: English

**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, 24-28 March 2025

Item 5 (a) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:****Pending issues****Proposed amendments to RID/ADR 5.4.1.1.3.2 regarding  
information on the quantity transported in the transport  
document****Transmitted by the European Federation of Waste Management and  
Environmental Services (FEAD)\*,\*\****Summary*

<b>Executive summary:</b>	Proposed amendment of 5.4.1.1.3.2 to extend its scope.
<b>Decision to be taken:</b>	Amendment of 5.4.1.1.3.2.
<b>Related documents:</b>	Document ECE/TRANS/WP.15/AC.1/2023/48 from the Government of Ireland and informal document INF.35 from FEAD, both transmitted to the Joint Meeting session held on 19-29 September 2023. In addition, informal document INF.27 transmitted by FEAD to the Joint Meeting session held on 25-28 March 2024 and document ECE/TRANS/WP.15/AC.1/2024/42 transmitted by Ireland and FEAD to the Joint Meeting session held on 10-13 September 2024.

\* A/79/6 (Sect. 20), Table 20.6.

\*\* Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2025/20.



## I. Background

1. FEAD welcomed the introduction of new provision 5.4.1.1.3.2 when it was included in the 2023 edition of the RID/ADR/ADN.
2. At the September 2023 session of the Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods, Ireland submitted working document [ECE/TRANS/WP.15/AC.1/2023/48](#) to propose an amendment to 5.4.1.1.3.2 to permit, in addition, the estimation of medical or clinical waste (UN No. 3291) already packaged in accordance with RID/ADR 4.1.4.1, packing instruction P621. The Joint Meeting adopted the proposed amendments to 5.4.1.1.3.2 of RID/ADR/ADN. In addition, some delegations stated that other substances excluded on account of being mentioned in 2.1.3.5.3 could also be considered, such as aerosols, and other clinical and medical waste not packaged according to packing instruction P621.
3. At the same session of the Joint Meeting in September 2023, FEAD submitted informal document [INF.35](#) to provide further information on the estimation of quantities for waste in accordance with 5.4.1.1.3.2. FEAD requested the Joint Meeting to consider allowing an estimation of waste in tanks, other than vacuum operated waste tanks. The justification provided was that in some cases, only an estimated quantity is available also for 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 easily be made with the availability of the degree of filling. 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.
4. The informal working group on the transport of hazardous waste (IWG) hold a meeting on 8 February 2024 in which the possible further revision of provision 5.4.1.1.3.2 was discussed. The IWG discussed the extension of the scope of 5.4.1.1.3.2, based on a proposal which changes the approach of the current rule for estimated quantities. Rather than excluding all waste containing substances mentioned in 2.1.3.5.3, the provision could list the individual types of substances for exclusion, such as waste containing substances of Class 1 or Class 7. Some delegates present at the IWG recommended extending the exclusion to high consequence dangerous goods as defined in Chapter 1.10, while the Joint Meeting finally advised against it when the proposal was presented in September 2024.
5. Indeed, FEAD submitted [ECE/TRANS/WP.15/AC.1/2024/42](#) to the Joint Meeting in September 2024 and received feedback, including that during an informal lunch break meeting. The IWG met again in October 2024 and worked on an updated proposal submitted in this document. Gathering the different views expressed within the IWG in relation to tanks, FEAD submits a proposal with two alternatives.
6. It is herewith clarified that maximum weight limitations shall not be exceeded on the basis of the proposed amendments, and that any change shall only affect RID/ADR/ADN.

## II. Proposal

7. Two options are proposed to the Joint Meeting. Proposed amendments to 5.4.1.1.3.2 are marked in bold and underlined or stricken-through, considering the text of RID/ADR/ADN 2025, as follows:

*Option 1:*

"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 will be 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 wagon/vehicle equipment), provided that a device or procedure is used to ensure compliance with the regulated degrees of filling.~~

Such estimation of the quantity is not allowed for:

- (d) Exemptions for which the exact quantity is essential (e.g. 1.1.3.6);
- (e) 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;~~
- (i) UN 3291 clinical waste, unspecified, n.o.s. or (bio) medical waste, n.o.s. or regulated medical waste, in packagings conforming to packing instruction P621, IBC620 or LP621;
- (ii) UN 1950 aerosols and UN 2037 gas cartridges;
- (iii) Waste carried under 4.1.1.5.3.
- (f) 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”. ”

*Option 2:*

"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 will be 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 wagon/vehicle equipment).

Such estimation of the quantity is not allowed for:

- (d) Exemptions for which the exact quantity is essential (e.g. 1.1.3.6); **and**
- (e) 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;~~
- (i) UN 3291, medical or clinical waste, in packaging conforming to P621, IBC620 or LP621;
- (ii) UN No. 1950, aerosols and UN No. 2037 gas cartridges;
- (iii) Waste carried under 4.1.1.5.3.
- (f) Substances of Class 4.3;
- (g) 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”. ”

### III. Justification

8. Since the introduction of provision 5.4.1.1.3.2 in RID/ADR/ADN 2023, the experience from the industry in different countries has evidenced its practical limitations due to the strict scope restrictions as there are more situation in which the quantity of transported waste can only be estimated.

9. The example of waste oils collected in garages has already been mentioned in the background information. In addition, Ireland consulted with stakeholders in the waste industry, to request if there are substances, currently excluded from estimation under the current provisions of 5.4.1.1.3.2 that could potentially be estimated without impacting safety during carriage. From this consultation it resulted that, in practice, such estimation of quantities is already happening as most sites do not have the capabilities for weighing waste, and the quantities in the transport document are best estimates from the information provided by the packers and consignors. The number and size of packages are always recorded in the transport document and the estimated total quantity per UN number is recorded.

10. In relation to class 6.2 waste, medical and clinical waste (UN No.3291) is carried in wheelie bins (for example with a capacity of 770 l). Such wheelie bins are often only approved for solids and the waste is treated as a “solid” waste. The solid waste placed into the wheelie bins may be in clinical waste bags. The estimation clause in 5.4.1.1.3.2 is also applied where the quantity of waste is estimated in kilogrammes in packaging such as wheelie bins which have a nominal capacity in litres.

11. In relation to tanks, many pharmaceutical or medical devices and other sites do not have weighbridges for their wastes leaving site in tanks as well as vacuum operated waste tanks. The quantity of waste in tanks is currently estimated.

12. For packed waste, the number and type of packagings are provided in the transport document including the nominal volume for packagings and then an estimation of the gross mass from the consignor or packer. Most packed waste loads being transported are a mixture of classes of waste and so some are permitted to be estimated under the current provisions of 5.4.1.1.3.2, and some are not. This makes it difficult to manage from a system and documentation perspective.

13. The proposal reflects current practice and thus, it is not considered that the proposal increase the risk level associated with the use estimated quantities. Waste is highly controlled, and all other RID/ADR/ADN provisions apply and are complied with.

---