

FEAD position on the use of IBCs (intermediate bulk containers) as salvage packagings under the ADR Agreement

4 February 2016

Item 14 of the report of the Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods on its autumn 2015 session states the following:

*14. It was noted that the current 4.1.1.19.1 of RID and ADR permitted the use of IBCs as salvage packagings. Alignment with the UN Model Regulations would no longer permit that and it was suggested that **the relevant industry should be consulted** before taking a decision on the proposed alignment, as the United Nations Sub-Committee of Experts **might not have taken into account the needs of the waste management industry**.*

FEAD would like to take this opportunity to comment on the proposed amendment.

The ADR Agreement (4.1.1.19.1: Use of salvage packagings and large salvage packagings) currently reads:

*“This does not prevent the use of a bigger size packaging, **including intermediate bulk container (IBC)** and large packaging, of appropriate type and performance level under the conditions of 4.1.1.19.2 and 4.1.1.19.3.”*

Following the amendment it would read:

“This does not prevent the use of a larger size packaging or large packaging of appropriate type and performance level and under the conditions of 4.1.1.19.2 and 4.1.1.19.3.”

FEAD is concerned that the amended version no longer makes reference to IBCs. Some of our members use IBCs as salvage packagings (see *illustration on the next page*). We see a risk that if there is no explicit reference to IBCs anymore, the ADR authorities will no longer allow their use. In this case our members would be obliged to buy new salvage packagings.

This would in our view entail unnecessary additional costs. IBCs are widely available as empty containers. They are immediately available if there is a need for salvage packagings. If IBCs are no longer permitted as salvage packagings, new salvage packagings will need to be purchased in addition to the existing IBCs.

FEAD therefore requests the ADR Working Party to reintroduce the reference to IBCs in the amendment on salvage packagings (ADR Agreement 4.1.1.19.1).

Illustration of the use of IBCs as salvage packagings in Germany:



The IBC containers are not exclusively used for liquid waste (approved ADR packaging 31A) but are operated as salvage packagings under 11A (metal IBCs: steel containers for solids).

The containers do not have an opening at the top: the cover can be opened and put back to close the container. The IBC containers can hence be used as salvage packaging to transport drums up to 200 liters (see pictures).

An IBC with an 11A code can according to Chapter 4.1.1.19.1 be used as salvage packaging, but this would no longer be the case if the amendment for the ADR 2017 is adopted.

About FEAD

FEAD, the European Federation of Waste Management and Environmental Services, represents the European private waste management industry. FEAD's members are national waste management associations covering 18 EU Member States, Serbia and Norway. They have an approximate 60% share in the household waste market and handle more than 75% of industrial and commercial waste in Europe. Their combined annual turnover is approximately € 75 billion.

FEAD represents about 3,000 companies with activities in all forms of waste management. These companies employ over 320,000 people who operate around 2,400 recycling and sorting centres, 1,100 composting sites, 260 waste-to-energy plants and 900 controlled landfills. They play an important role in the determination of the best environmental option for waste management problems.