

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

4 March 2016

Bern, 14–18 March 2016

Item 5 (a) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:
pending issues**

Special provision 636 – The carriage of waste electrical equipment containing lithium batteries for recycling or disposal

Transmitted by the Government of the United Kingdom

Summary

1. The United Kingdom is accepting of the proposals referred to in Information Paper 26 submitted by the Government of Germany. The United Kingdom understands that these changes are necessary and helpful clarifications, removing any remaining doubt that Special Provision 636 (b) applies to lithium cells and batteries contained in equipment from private households collected and handed over for carriage for dismantling, recycling or disposal.
 2. The United Kingdom intends to participate in the 2nd meeting of the informal working group on the transport of waste electrical and electronic equipment on 27 and 28 April 2016.
 3. The United Kingdom will use that forum to explain that it has studied consignments of waste electrical equipment collected from Household Waste Recycling Centres being carried in bulk in containers to Intermediate Processing Facilities. That research demonstrates that only 0.06% by weight of this waste stream comprises batteries in total, only some of which will be lithium cells or batteries. Even assuming all batteries are lithium, that would equate to only 1.2kg of lithium ion batteries in a typical 2 tonne load or 1.8kg of lithium ion batteries in a 3 tonne load. An average laptop battery weighs 270g equating to only four such batteries in a 2 tonne load or six in a 3 tonne load.
 3. Over many years of operational experience, the United Kingdom has no evidence of such consignments of waste electrical equipment posing a hazard during carriage. It does not envisage any significant safety benefit from requiring such loads to be packaged in accordance with Special Provision 636 (b) and P909 (2).
 4. The United Kingdom looks forward to working with other interested parties to establish a proportionate approach to the carriage of waste electrical equipment based on a full assessment of costs, benefits and risk, perhaps leading to a more fundamental reform of Special Provision 636 (b) in the 2017 Editions of RID/ADR/ADN.
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