

New requirements in ADR 2025 relating to the carriage of UN 2212 and UN 2590.

(Reference documents: ECE/TRANS/WP.15/265, ECE/TRANS/WP.15/265/Corr.1, ECE/TRANS/WP.15/265/Add.1)

For ADR 2025, the entries in Dangerous Goods List (table A in chapter 3.2) for UN 2212 (ASBESTOS, AMPHIBOLE) and UN 2590 (ASBESTOS, CHRYSOTILE) have been updated to include the following codes:

Column number	Codes inserted
column (6)	"678"
column (17)	"VC1", "VC2" and "AP12"
column (18)	"CV38"

Special provision "678" is a new special provision that has been added 3.3.1 of ADR:

- "678"
- (a) The waste is carried only from the site where it is generated to a final disposal facility. Between these two types of sites, only intermediate storage operations, without unloading or transferring the container-bag, are authorized;
 - (b) The waste belongs to one of these categories:
 - (i) Solid waste from roadworks, including asphalt milling waste contaminated with free asbestos and its sweeping residues;
 - (ii) Soil contaminated with free asbestos;
 - (iii) Objects (for example, furniture) contaminated with free asbestos from damaged structures or buildings;
 - (iv) Materials from damaged structures or buildings contaminated with free asbestos which, because of their volume or mass, cannot be packed in accordance with the packing instruction applicable to the UN number used (UN No. 2212 or 2590, as appropriate); or
 - (v) Construction site waste contaminated with free asbestos from demolished or rehabilitated structures or buildings which, because of their size or mass, cannot be packed in accordance with the packing instruction applicable to the UN number used (UN No. 2212 or 2590, as appropriate);
 - (c) Waste covered by these provisions shall not be mixed or loaded with other asbestos-containing waste or any other hazardous or non-hazardous waste;
 - (d) Each shipment shall be considered a full load as defined in 1.2.1; and
 - (e) The transport document shall be in conformity with 5.4.1.1.4."

"VC1" and "VC2" are existing ADR requirements which require:

VC1 Carriage in bulk in sheeted vehicles, sheeted containers or sheeted bulk containers is permitted;

VC2 Carriage in bulk in closed vehicles, closed containers or closed bulk containers is permitted;

"AP12" is a new additional provision which requires:

"AP12 The waste may be carried in bulk provided that it is contained in a bag of the size of the load compartment, referred to as a "container-bag".

The container-bag is intended to be loaded only when placed inside a bulk load compartment with rigid walls. It is not intended for handling or to be used alone outside of this compartment.

For the purposes of this provision, container-bags shall have at least two components.

The inner component shall be dust-tight to prevent the release of dangerous quantities of asbestos fibres during carriage. The inner component shall be a polyethylene or polypropylene film.

The outer component shall be polypropylene and shall be fitted with a zipper system. It shall ensure the mechanical resistance of a container-bag loaded with waste to the shocks and stresses in normal conditions of carriage, in particular when a load compartment loaded with container-bags is transferred between vehicles and storage facilities.

Container-bags shall:

- (a) Be designed to resist perforation or tearing by contaminated waste or objects due to their angles or roughness;
- (b) Have a zipper system that is sufficiently tight to prevent the release of dangerous quantities of asbestos fibres during carriage. Laced or flapped fasteners are not authorized.

The load compartment shall have rigid metal walls of sufficient strength for its intended use. The walls shall be sufficiently high to completely contain the container-bag. Provided the container-bag offers similar protection, the sheeting of the vehicle can be omitted when using the VC1 provision.

Objects contaminated with free asbestos from damaged structures or buildings, as well as construction site waste contaminated with free asbestos from demolished or rehabilitated structures or buildings as mentioned in special provision 678 (b) (iii), (iv) and (v), shall be carried in a container-bag placed inside a second container-bag of the same type. The total mass of the contained waste shall not exceed 7 tonnes.

In all cases, the maximum mass of the waste shall not exceed the capacity specified by the container-bag manufacturer.”

“CV38” is a new provision which requires:

- “CV38 The load compartments shall have no sharp internal edges (internal steps, etc.) capable of tearing container-bags during unloading. They shall be inspected before any loading operation.
- The container-bags shall be placed in the load compartments for carriage prior to any filling. The outer component of the container-bags shall be positioned so that the slider of the zipper is placed on the front side of the load compartment when closed. After filling, the container-bags shall be closed in accordance with the manufacturer’s instructions.
- Once loaded, the container-bags shall not be lifted or transferred from one load compartment to another. Multiple filled container-bags shall not be loaded into the same load compartment.
- After any filling operation and after closing, the outer surfaces of the container bags shall be decontaminated.
- Container-bags carried in removable load compartments shall be unloaded with the latter placed on the ground. The unloading of container-bags filled with roadworks waste or with soil contaminated with free asbestos by tipping the load compartment is authorized, provided that an unloading protocol agreed jointly between the carrier and the consignee is respected to prevent the container-bags from tearing during unloading. The protocol shall ensure that the container-bags do not fall or tear during the unloading operation.”

Documentation

In relation to the amendments set out above, 5.4.1.1.4 has been amended to apply the following requirement:

“5.4.1.1.4 *Special provisions for wastes contaminated with free asbestos (UN Nos. 2212 and 2590)*

When special provision 678 of Chapter 3.3 is applied, the following statement shall be included in the transport document "Carriage under special provision 678".

The description of wastes carried in accordance with special provision 678 (b) of Chapter 3.3 shall be added to the description of dangerous goods required in 5.4.1.1.1 (a) to (d) and (k). The transport document shall also be accompanied by the following documents:

- (a) A copy of the technical data sheet for the type of container-bag used, on the manufacturer's or distributor's letterhead, giving the dimensions of the packaging and its maximum mass;
- (b) A copy of the unloading procedure in accordance with special provision CV38 of 7.5.11, if applicable.”

Interpretations / notes on the above requirements

These provisions allow the bulk carriage of asbestos waste within container bag(s). It should be noted that the container bag(s) are not required to be manufactured to a particular standard or be UN Approved (and will not therefore have a packaging code) but they will need to fulfil the requirements set out above. The container bag is not a package; the definition of a package within ADR does not apply to goods that are carried in bulk (see definition of package in ADR 1.2).

To fulfil the above requirements the consignor, filler and the carrier must ensure the technical data sheet provided by the manufacturer for the container-bag allows the use of the bag for the transport operation in question. In this respect, consideration should be given to the properties of the polypropylene outer component of the container-bag, and particularly its density per square meter. Polypropylene having a higher density per square metre is likely to be more resistant to damage or tears during either loading or removal of the bag from the bulk container.

The inner component of the container bags is required to be dust-tight and therefore, they cannot be used for any large items that could protrude from the confines of the bag and result in the zipper system not being able to be drawn completely closed.

The walls of the bulk container must be sufficiently high to completely contain the container-bag. In our view this means the rigid walls of the bulk container must be higher than entire container bag when the bag is loaded.

We believe the intention of these provisions is that the container bag should be a single use containment system, and it was thought the preferred method of loading the container bags would be by mechanical means. The total mass of the contained waste must not exceed 7,000 Kgs, even though the bag may have a greater mass or volume capability.