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SURVEY OF PROGRAMMES AND ACTIVITIES OF
INTERNATIONAL BODIES AND ORGANIZATIONS RELEVANT TO THE
ENVIRONMENTALLY SOUND MANAGEMENT OF HAZARDOUS WASTES

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with consultant assistance

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Introduction

1. This survey has been prepared on the basis of information obtained by the UNEP secretariat, with consultant assistance, from other organizations dealing with the environmentally sound management of hazardous wastes, for the purpose of updating a preliminary survey which was submitted to the Ad Hoc Working Group of Experts on the Environmentally Sound Management of Hazardous Wastes at its second session held in Geneva from 3 to 7 December 1984 (UNEP/WG.111/INF.2). The focus of the present survey is thus on information reflecting developments since December 1984, and on the activities and programmes of organizations having a bearing on the substance of the draft guidelines for the environmentally sound management of hazardous wastes (UNEP/WG.111/3, annex II).

2. It is recognized that a number of other organizations both inside and outside the United Nations system carry out work relevant to transfrontier movements of hazardous wastes, including the Customs Co-operation Council, the International Organization for Standardization and a number of specialized organizations dealing with the international carriage of goods by different modes of transport. To the extent that this work concerns transport documents, it is reported on in an earlier consultant study on "Harmonization of documentary requirements for transfrontier movements of hazardous wastes", prepared in co-operation with the Economic Commission for Europe and submitted to the Ad Hoc Working Group at its second session (UNEP/WG.111/INF.1).

3. Although radioactive wastes, in particular, are excluded from the scope of the draft guidelines, the Ad Hoc Working Group has benefited from background information on the relevant experience of the International Atomic Energy Agency (IAEA) and from the participation of IAEA representatives in its earlier sessions.

A. United Nations Environment Programme (UNEP)

4. Prior to the establishment of the Ad Hoc Working Group of Experts on Environmentally Sound Management of Hazardous Wastes, which was set up under UNEP Governing Council decisions 10/21 and 10/24, on the basis of the recommendations of the 1981 Montevideo Meeting of Senior Government Officials Expert in Environmental Law, activities in this field had already been initiated by the UNEP Industry and Environment Office and the UNEP International Register of Potentially Toxic Chemicals (IRPTC), resulting, inter alia, in special issue No. 4 of the newsletter Industry and Environment "Industrial hazardous waste management" (1983, printed in English, French and Spanish).

5. The Governing Council of UNEP, at its eighth session in 1980, adopted decision 8/8 on export and disposal of hazardous chemical wastes. In this decision the Governing Council requested the Executive Director, in co-operation with competent organizations in the United Nations system and other international organizations, to develop, after consultation, guidelines for the safe and appropriate disposal of hazardous chemical wastes and pertinent measures concerning their transboundary transport. A Working Group was convened jointly by UNEP and the WHO Regional Office for Europe, in collaboration with the Government of the Federal Republic of Germany, at Garmisch-Partenkirchen in March 1981, to develop policy guidelines and a code of practice for hazardous waste management. On the basis of a first draft

document prepared by senior expert consultants, the Working Group produced a number of conclusions and recommendations for the development of guidelines and for appropriate mechanisms to control transfrontier movements of hazardous wastes. The guidelines were finalized and published in 1983, under the joint sponsorship of UNEP and WHO, as "Management of hazardous waste - Policy guidelines and code of practice" (WHO Regional Publications, European Series No. 14). The publication, which has been translated into French, has been widely distributed to Governments and others. German and Russian versions are in preparation, and translation into Spanish is being considered.

6. The World Industry Conference on Environmental Management, jointly sponsored by UNEP and the International Chamber of Commerce at Versailles, France, in November 1984, agreed that "mismanagement of toxic and hazardous wastes poses a serious threat to public health" and that "special efforts are needed to control the safe handling of such wastes."

B. United Nations Economic Commission for Europe (ECE)

7. Activities in the field of hazardous waste control have held an important environmental focus for the past 10 years in ECE. At their first session in 1973, the Senior Advisers to ECE Governments on Environmental Problems initiated work leading to a number of reports on the status of, and experience with, national legislation in ECE member countries for the control of toxic waste discharges into the environment. In 1977 consideration was given to the feasibility of developing a "cradle-to-grave" accounting system to follow toxic wastes from the point of generation to final destruction or safe disposal. At that time it was concluded that a uniform accounting system was difficult to elaborate for ECE member countries because of legislative, industrial and geographical dissimilarities. However, a generalized set of conditions for setting up an effective accounting system was outlined, and the management of an idealized national system was described. Continuing consideration of the control of the flow of toxic substances throughout the environment recognized the need for further limitations on the discharge of these substances and the utility of their recovery and reuse, national and international waste exchanges, and codes of practice for the effective treatment and safe disposal of unrecoverable residues. The Senior Advisers, at their sixth session in 1978, reviewed suggested guidelines for reporting/accounting systems for toxic wastes control. They concluded that it was too early to envisage an agreed system of licences and control mechanisms for the ECE region since the legal frameworks and policies and strategies relating to waste management varied widely according to geographical and economic conditions. Following this work, a new survey of national and international legislation, administrative measures and experience relating to the control of toxic substances, with particular emphasis on toxic wastes in the ECE region, was prepared for the eighth (1980) session of the Senior Advisers. The survey indicated, *inter alia*, that in spite of the important differences in industrial and population densities, technological standards and experience, and economic and social frameworks in ECE member countries, there was general agreement that:

(a) The control of hazardous/toxic wastes remains a distinct issue from that of regulation of hazardous substances and mixtures;

(b) A shortage of well-equipped facilities to treat highly dangerous wastes from diverse sources poses a general problem;

(c) The "enterprise system" for collection, storage, transport, treatment and/or final deposition of toxic wastes needs special economic incentives and the benefit of research programmes on new technologies for the economical and effective control of these wastes;

(d) Recovery and reuse of hazardous wastes represent the most economic methods of control, with few exceptions.

8. Since 1980 the control of toxic waste has been a continuing activity of a subsidiary body to the Senior Advisers, the Working Party on Low- and Non-waste Technology and Reutilization and Recycling of Wastes. The main activities of this body have been the development of a compendium of industrial technologies for lower waste generation per unit of product, exchange of information on national and international waste "clearing-houses" or exchanges, and the analysis of incentives and policy measures for the promotion of low-waste and non-waste technology and reutilization and recycling of wastes. At their twelfth session, in February 1984, the Senior Advisers decided to invite the Working Party to explore possible new projects on this issue including problems related to the treatment and final storage of toxic wastes. At their thirteenth session in March 1985, on a proposal by the USSR, the Senior Advisers agreed that "effective management of hazardous wastes must be addressed in a comprehensive, sectorally integrated context demanding co-ordination among all interests concerned".

9. In response, a document concerning recovery and reutilization of materials contained in substances originally designated as hazardous wastes and destined for disposal has been developed. Practices and technologies for recovery of useful items from a variety of wastes are under consideration and review. Results of these efforts will be presented in January 1986. A proposal by the Executive Director of ECE that the work programme should be expanded to deal with both treatment and disposal of hazardous wastes and risk assessment in hazardous waste management was not accepted for 1985. The proposal is expected to be reintroduced at the January 1986 session of the Senior Advisers.

10. The ECE Chemical Industry Committee has been dealing with hazardous waste management since 1975. The following studies should be mentioned in this connection: "Technical progress and its role in combating high-waste technologies in the inorganic chemical industry" (1978); "Utilization of wastes by the chemical industry" (1980); and "Low- and non-waste technologies in the production of organics" (1984).

11. The Conference of European Statisticians has started work on a draft ECE Standard International Classification of Solid Wastes, of which hazardous wastes will be a separate category. The project is part of an extensive work programme in the area of environment statistics. As the developmental work in this field is gradually coming to a conclusion, the Conference approved in June 1984 a plan to issue an experimental Compendium of Environment Statistics for ECE Member Countries. The experimental Compendium will be issued in 1987, and it will contain data compiled in accordance with the draft solid waste classification. First results from the work on the classification for use in the experimental Compendium will become available by the end of 1985.

12. The Committee of Experts on the Transport of Dangerous Goods, the standing subsidiary body of the Economic and Social Council which produced and

updates the "Orange book", elaborates world-wide recommendations covering inter alia the classification of dangerous goods, packing requirements, testing procedures, marking, labelling and shipping documents. The ECE Inland Transport Committee's Group of Experts on the Transport of Dangerous Goods is responsible for international instruments such as the regulations concerning the carriage of dangerous goods by rail (RID), road (ADR) and inland waterways (ADN, still in draft form). These instruments contain detailed requirements including provisions relating to vehicles (tanks, containers, loading, etc.) and the training of drivers.

13. In connection with both ADR and RID, consideration has recently been given to the promulgation of requirements dealing with wastes. In both cases, it has been decided that wastes should not be treated as a separate item, but should be subject to the same kind of régime as other dangerous materials. The result of this decision is that hazardous wastes must be analysed and identified in the same manner as any other dangerous cargo and must be subjected to the normal risk assessment required of such cargoes. The proposed requirements will be submitted to the governing bodies of ADR and RID in early 1986 and are expected to enter into force in 1987.

14. Furthermore, in August 1985, the Committee of Experts itself considered the question of the transport of substances which might be described as specifically environmentally harmful substances. The Committee also decided that it would be inadvisable to provide that wastes of this type should be treated differently from their component substances. It was recognized that some wastes not covered by the "Orange book" might nonetheless pose a threat to the environment in some circumstances (e.g. because of the sheer scale of a spillage of the substance in question). It was suggested that such cases might be met by adding a further classification to class IX of the Recommendations (Miscellaneous dangerous goods).

15. As far as relevant transport documentation and procedures are concerned, the Inland Transport Committee elaborated in 1956 and is currently responsible for, a Convention on the Contract for the International Carriage of Goods by Road (CMR), which includes provisions on the "Consignment note", the basic road transport document on which should appear "the description in common use of the nature of the goods and the method of packing, and, in the case of dangerous goods, their generally recognized description". More recently (1982) an International Convention on the Harmonization of Frontier Control of Goods has been elaborated which may provide the framework for more detailed requirements applicable to the carriage of hazardous wastes.

16. CMR contains also provisions on liability, but only in respect of the loss of or damage to the goods transported. Concerning liability in respect of damage to third parties which may be caused during transport, a draft convention is being prepared within the International Institute for the Unification of Private Law at the request of the Inland Transport Committee (see section E below).

C. International Maritime Organization (IMO)

17. While IMO has not addressed itself specifically to questions raised by the maritime carriage of hazardous wastes, much of its work undertaken in connection with the transport and handling of dangerous materials as cargo is relevant to hazardous wastes.

18. A draft Convention on Liability and Compensation in Connection with the Carriage of Noxious and Hazardous Substances by Sea was considered by an International Conference on Liability and Compensation for Damage in Connection with the Carriage of Certain Substances by Sea, convened under the auspices of IMO in 1984. The discussion of the draft revealed that many complex issues remained unresolved, however, and it proved impossible to arrive at agreement on these matters at the Conference. The Conference therefore referred to draft back to IMO, which it recommended should give priority to the preparation of a new draft and take steps to convene a new diplomatic conference as early as possible.

19. The Council of IMO considered the recommendation (and a preliminary exchange of views on the subject in the IMO Legal Committee) at its meeting in November 1984. The Council requested the IMO Secretary-General to prepare a report identifying the areas in respect of which disagreement existed. While the substances to which the draft Convention originally applied were not such as frequently cause problems in the waste management area, it should be noted that the substances to which such a convention should apply is one of the areas in which there remains some differences of view.

20. The International Convention for the Safety of Life at Sea (SOLAS, 1974, as amended) includes in chapter VII provisions on the transport of dangerous goods. Dangerous goods are classified into nine classes, defined according to hazardous effect, e.g. explosives, corrosive substances, etc. Further details relating to packaging, stowage, labelling and other questions (including containerization) are set out in the International Maritime Dangerous Goods Code (IMDG Code), which applies to all vessels covered by SOLAS and which therefore has an incidental effect on the practices of manufacturers and shippers of goods which have to be transported by sea.

21. The IMDG Code needs to be frequently updated in a rapid and efficient manner, if its efficacy is to be maintained. This is achieved through the medium of the Maritime Safety Committee of IMO, which is empowered to adopt amendments to the IMDG Code without further formality, provided that these amendments do not touch the principles upon which the Code is founded. The Maritime Safety Committee acts on the advice of a Sub-Committee on the Carriage of Dangerous Goods, whose recommendations, if adopted, enter into force uniformly six months after their publication.

22. The IMO Marine Environment Protection Committee is currently concerned primarily with the revision of annex II to the 1973 International Convention for the Prevention of Marine Pollution (MARPOL), which deals with noxious liquid substances carried in bulk. This annex includes provisions relating to the disposal of residues left in the cargo spaces and piping of vessels carrying such liquids. At its meeting in April 1985, the Committee finalized its proposals for ensuring that only minute quantities of these substances remain in the ship after discharge and cleaning. These proposals set out technical standards which must be met by all ships built after the end of June 1986, and which must be retrofitted into existing vessels by 1994. The Committee has also finalized a set of draft standards to serve as guidance for the operation of the provisions of the Annex relating to discharges from such vessels. Both these proposals will be reconsidered at the next meeting of the Committee in December 1985 with a view to adoption. If they are so adopted, it is envisaged that they will come into force in 1987.

23. The Committee also turned its attention during its April 1985 meeting to annexes III-V to MARPOL which are optional. Annex III deals with noxious liquid substances in packaged form, which may have some significance for waste management. The Committee decided that it would in future accord priority to this annex in its work programme, and a special sub-committee has been asked to consider whether the annex should impose damage stability and hull subdivision criteria for ships carrying packaged noxious liquids, as the sort of general cargo vessels which commonly carry these substances are not required to meet such criteria under the SOLAS Convention.

24. Goods carried in bulk, aboard specially constructed or adapted vessels, are covered by the IMO Code of Safe Practice for Bulk Cargoes (BC Code). Revision of the BC Code is the responsibility of the IMO Sub-Committee on Containers and Cargoes, and one of the categories of cargo given particular attention is that of solid materials presenting chemical hazards, a classification recently established. The IMO Sub-Committee on Bulk Chemicals deals with questions of safety measures and handling and transport procedures relating to the carriage of liquid and gaseous dangerous substances in bulk. Furthermore, IMO is responsible for technical construction codes, including the International Code for the Construction and Equipment of Ships Carrying Dangerous Chemicals in Bulk (IBC Code), and the International Code for the Construction and Equipment of Ships carrying Liquefied Gases in Bulk (IGC Code). Technical standards for the construction and equipment of ships engaged in dumping, developed by the Sub-Committee on Bulk Chemicals, will be submitted to the fourteenth IMO Assembly for adoption in November 1985.

25. Matters relating to the dumping of hazardous wastes at sea are considered by the consultative meetings of the Contracting Parties to the 1972 London Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter. At the request of the Scientific Group on Dumping, the ninth consultative meeting in September 1985 revised the criteria for the allocation of substances to the annexes of the Convention, and considered a number of related issues, including problems relating to the import and export of wastes for disposal at sea.

D. World Health Organization (WHO)

26. Besides its regular work in the field of waste management -- including programmes at the regional level, and those of the WHO Regional Office for Europe in particular -- WHO has since 1979 been active, together with UNEP and the International Labour Organisation, in the International Programme on Chemical Safety (IPCS). One of its most important activities in this context has been the joint WHO/UNEP Environmental Health Criteria Programme, the purpose of which is to evaluate all available information on the effects of specific chemicals or groups of chemicals that may influence human health and the environment, so as to provide a scientific basis for policy decisions aimed at protecting human health and the environment from adverse consequences of exposure to such chemicals. More than 50 Environmental Health Criteria documents have been published or are in preparation, covering a wide range of subjects including heavy metals, air pollutants, pesticides, solvents and physical factors.

27. Other activities potentially relevant to hazardous wastes within the framework of IPCS include those of the UNEP/WHO/SCOPE* Scientific Group on Methodologies for the Safety Evaluation of Chemicals, and the monographs on the Evaluation of the Carcinogenic Risk of Chemicals to Humans published by the WHO International Agency for Research on Cancer (IARC) with UNEP support. A joint project now being prepared, with consultant assistance, under the auspices of WHO, UNEP and the World Bank, is a technical manual for the safe disposal of hazardous wastes in developing countries.

E. International Institute for the Unification
of Private Law (UNIDROIT)

28. UNIDROIT has been engaged for several years in a programme concerning the question of liability and compensation for damage caused during the carriage of dangerous goods by road, rail and inland waterways. The study was inaugurated in 1974, at the fifth-third session of the UNIDROIT Governing Council, at the request of the Government of the Netherlands, and originally concentrated on road transport, being subsequently extended to cover other forms of inland transport.

29. Following the completion of a preliminary study, a Committee of Government Experts was established in 1980 to prepare draft uniform rules, partly modelled on the IMO Draft Convention on Liability and Compensation in Connection with the Carriage of Hazardous and Noxious Substances by Sea. The Committee has held six meetings, in which some 30 States (20 of which are members of ECE) participated together with a number of intergovernmental and non-governmental organizations. Following a joint meeting with ECE transport experts (scheduled to be held in Geneva in November 1985), and subject to a decision by the Governing Council of UNIDROIT, the draft articles are expected to be finalized at the seventh meeting of the Committee in 1986, with a view to their transmission to ECE for final consideration and adoption.

30. While the draft articles do not attempt to define "dangerous goods", certain groups of hazardous substances to which the Convention would apply are listed in an annex. Primary liability for damage caused in the course of carriage is placed upon the carrier. Provision is made for limitation of liability, and for the establishment of a limitation fund from which compensation is to be paid. Carriers are required to take out liability insurance.

F. Organisation for Economic Co-operation and Development (OECD)

31. Direct OECD involvement with waste management questions dates back at least to March 1974, when a Waste Management Policy Group was established by the Environment Committee. A review of relevant member countries' policies at that time provided the basis for Recommendation C(76)155 on a Comprehensive Waste Management Policy, which the OECD Council adopted on 28 September 1976. This recommendation defines the three main principles of waste management as: reducing at source the total quantity of waste generated; extracting the maximum benefit from waste through material reclamation and energy recovery; and ensuring the safe transport and disposal of waste, especially for toxic and hazardous waste.

* SCOPE: Scientific Committee on Problems of the Environment, of the International Council of Scientific Unions (ICSU).

32. During the period 1976-1980, activities focused mainly on household wastes, with a view to implementing in practical cases the provisions of the above recommendation. A number of studies were carried out on beverage container reuse and recycling, waste paper recovery, the management of used tyres, the use of economic instruments in solid waste management, product durability, and separate collection of household wastes.

33. At the end of the 1970s, attention was drawn to the problems raised by abandoned sites where industrial wastes had been inadequately disposed of in the past. An expert seminar on hazardous waste "problem" sites was convened in November 1980, where participants exchanged practical experience on the location and characterization of sites, environmental and health impact assessment, and the remedial action. Basic data related to the economics of hazardous waste management were assembled and analysed, including the costs to industries of complying with laws and regulations governing hazardous wastes, and the costs to the administration of enforcing the rules; the benefits accruing from the proper implementation of controls of hazardous waste; and the insurance and other financial responsibility requirements for operations involving transport, treatment, storage and disposal of hazardous waste. Regulations imposed on those who generate, treat and dispose of hazardous waste in OECD countries were reviewed in a comparative analysis.

34. Following this work the emphasis shifted to the elaboration, by the Waste Management Policy Group, of Decision and Recommendation C(83)180 (Final) on Transfrontier Movements of Hazardous Waste, adopted by the OECD Council on 1 February 1984. This Decision and Recommendation seeks to protect the environment while ensuring the proper management of wastes, not by banning transfrontier movements, but by subjecting them to the requirement that monitoring and control should be integrated into the management of such wastes until their elimination. Thus, the Decision and Recommendation embraces the "cradle-to-grave" approach now almost standard in the field.

35. The Decision and Recommendation on Transfrontier Movements of Hazardous Waste imposes on States the duty to ensure that their competent authorities regulate the activities of enterprises engaged in waste management; to ensure that timely notifications of proposed movements of waste are received by their competent authorities; to respond diligently and constructively to requests for information from other States, typically importing or transit States; to enable their authorities to object to or prohibit the entry of shipments which do not comply with the legal requirements of the transit or destination State; and to authorize the reimport of shipments refused entry in other countries.

36. The principles set out in the Decision and Recommendation were expressed in terms of some generality, and it was necessary to translate them into positive strategies for implementation. In order to promote this objective, OECD held a seminar in June 1984 to consider the legal and institutional aspects of the problem. The purpose of this seminar was to prepare the background for a high-level Conference on International Co-operation concerning Transfrontier Movements of Hazardous Wastes which took place in March 1985 in Basel, Switzerland. The Conference considered the question of how more effective control of transfrontier shipments of hazardous wastes could be achieved in practice. The conclusions and recommendations of this conference were subsequently endorsed by the Environment Ministers of OECD member countries and embodied in Resolution C(85)100 on International Co-operation Concerning Transfrontier Movements of Hazardous Wastes, which the OECD Council adopted on 20 June 1985.

37. By adopting this Resolution, the OECD Council decided "to develop an international system for effective control of transfrontier movements of hazardous wastes, which will include appropriate OECD instruments such as further Acts of the Council covering notification, identification and control of such transfrontier movements, as well as an international agreement of a legally binding character". It instructed the Environment Committee to undertake the necessary work with a view to making proposals before the end of 1987.

38. Work is at present under way on most of the issues that the Basel Conference selected as requiring consideration when developing the OECD system for control of transfrontier movements of hazardous wastes. Such work includes:

(a) The definition of hazardous wastes including properties, characteristics and classification;

(b) The harmonization of technical standards for management, containment and control of hazardous wastes;

(c) The establishment of an OECD-wide system of notification, identification and monitoring of transfrontier movements, including the preparation of a handbook on relevant national practices;

(d) The development of an agreed list of hazardous wastes for transfrontier movements, and the finalization of a system for cross-referencing waste listed as hazardous in different countries;

(e) The development of adequate procedures for transfrontier movements of hazardous substances intended for recycling;

(f) The establishment of a set of principles with respect to transfrontier movements to and from non-OECD countries;

(g) The assessment of the effects of the OECD system upon various parties of interest, especially in terms of liability and insurance.

39. In addition, work is proceeding on a number of hazardous waste management issues not directly related to transfrontier movements, such as: assessment of sea disposal, including both dumping and incineration; management of small quantities of hazardous wastes from a large number of sources; legal and technical aspects of polychlorinated biphenyl waste disposal; dioxin issues associated with waste incineration; and policies related to uncontrolled hazardous waste disposal sites.

G. European Economic Community (EEC)

40. On 6 December 1984, the Council of the European Communities adopted a directive on the supervision and control within the Community countries of the transfrontier shipment of hazardous wastes (Council Directive 84/631/EEC, in force since 1 October 1985). This directive, which introduces a notification system for movements of wastes within the Community, applies to those wastes covered by the Council directive on toxic and dangerous wastes (Council Directive 78/319/EEC), and to polychlorinated biphenyls (Council Directive 76/403/EEC). In outline, the directive requires that any person wishing to

ship such wastes from one EEC member State to another, or wishing to route such wastes through a member State, or wishing to export such wastes from the Community to a third country, must notify the competent authorities in the member States in question or in the third country, whichever is appropriate. The notification must take the form of a consignment note, a model of which is annexed to the directive. The authorities to be notified must also be given adequate information on a number of specified matters, such as the source and composition of the wastes, the routing to be adopted, the insurance provision which has been made in respect of the shipment, and so forth, and it must be demonstrated that there is a contractual agreement with a consignee who has adequate technical capacity to dispose of the wastes without causing a hazard to human health or to the environment.

41. No shipment may be begun until the competent authority to which the notification has been addressed has acknowledged receipt of it. The authority may object to the proposed shipment, but it may only do so on the basis of the shipment's incompatibility with domestic legislation on environmental protection, safety, public policy or public health which is compatible with EEC directives or with obligations undertaken by the member State in question under other international conventions to which it is a party.

42. Member States from which the shipment is dispatched, or through which it is to be in transit may impose conditions upon its carriage while on their territory. The consignment note must accompany the load at all times and, when the shipment leaves the Community (if it does so), the customs authorities of the member State from which it departs are responsible for ensuring that a copy of the consignment note reaches the competent authority of that State. States may also designate particular border crossings as those at which it is lawful for such shipments to cross.

43. The Directive makes reference to the necessity for shipments to be properly packed and labelled, etc., but does not itself set out any standards in this connection, thus leaving these matters to be dealt with by the conventions applicable to the mode of transport concerned.

44. Under EEC auspices, the European Foundation for the Improvement of Living and Working Conditions has undertaken a study on national legislation in EEC member States concerning the transport of non-nuclear toxic and dangerous goods, substances and wastes. The study of national elements was completed in 1985, and the results are to be submitted to an evaluation seminar to be held in 1986 for representatives of Governments, employers' organizations and trade unions in EEC member States.