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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS
Sub-Committee of Experts on the Transport of Dangerous Goods
(Twenty-third session, 30 juin-4 July 2003
Agenda item 9)

Comments on new requirements for infectious substances

Transmitted by the International Civil Aviation Organization (ICAO)

BACKGROUND

A meeting of the ICAO Dangerous Goods Panel Working Group of the Whole took place in Montreal (5 to 9 May 2003) to review proposed amendments to the Technical Instructions based on the 13th edition of the UN Recommendations. The following comments are offered on the new requirements for infectious substances.

CHAPTER 2.0

It is suggested clarification is required regarding the precedence of hazards which must be followed if diagnostic specimens are packed with dangerous goods of other classes.

CHAPTER 2.6

2.6.3.1.3

It is suggested further clarification of the definition is needed due to the possibility of a person claiming a culture was developed for diagnostic purposes and thus could be classified as UN3373

2.6.3.2.4

It is suggested this may allow blood or blood components, if collected for blood transfusion purposes before complete screening, to be exempted from the regulations even though it may contain infectious substances.

2.6.3.2.5

It is noted the use of the phrase "low probability" is an old concept and it is suggested this should be avoided to minimize confusion.

It is queried if a sample is taken from a living person, could that sample be considered as being not subject to the Regulations?

It is suggested to add the phrase "so that they no longer pose a health risk" after "deactivated" in the last sentence.

2.6.3.5.1

It is noted medical or clinical wastes, consigned as UN3291, requires documentation, labelling and marking whereas the original sample, if containing diagnostic specimens and consigned as UN3373, only requires the UN3373 mark.

PACKING INSTRUCTION 650

It is suggested a minimum size should be prescribed for the UN3373 mark.

It is suggested the proper shipping name “Diagnostic specimen” or “Clinical specimen” be added beside the mark - the working group does not believe the UN3373 mark is sufficient for hazard communication purposes.

It is noted P650 contains different requirements for the packaging of liquid and solid diagnostic specimens; it is suggested guidance should be provided for solid samples (i.e. frozen) containing residual liquid.

Although training is not a requirement, it is suggested guidance on Category B substances should be given to users of P650.

Additional comments on P650

The working group agreed to retain the quantity limits in the current ICAO packing instruction 650 until advice is obtained from WHO regarding any possible increased risk with the inclusion of former risk group 2 or 3 substances in Category B.

The working group agreed:

to require the air eligibility mark on packages containing diagnostic specimens;

to include a requirement for overpack markings

not to require a dangerous goods transport document; and

not to require an acceptance check.

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