

## 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

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Item 7 of the provisional agenda

### MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

#### Infectious Substances

#### Comments on ST/SG/AC.10/C.3/2004/73 (ICAO)

#### Transmitted by the expert from Austria

The expert from Austria highly appreciates the document from ICAO and believes that most of the proposals contained in its annex, when adopted, would lead to valuable improvements.

Only in the case of the proposal under 2. he has reservations. There, it is proposed to amend paragraph (c) in section (2) of P650, to require a **rigid** outer packaging. Having consulted national postal services he comes to the conclusion that a rigid outer packaging may not always be the best solution compared f.i. with a cushioned envelope. It is true that mail shipments of diagnostic specimens in order to avoid them being crushed have to be kept away from automatic mail sorting machines but such crushing happens in fact to rigid outer packagings as well, in particular when their dimensions are very small. Austrian mail services therefore require for diagnostic specimens always shipments as “registered mail” in order to exclude automatic sorting.

ICAO has a point however insofar as P650 as it stands does not seem to require any specific quality for the outer packaging. Formally the general packing provisions of 4.1.1.1 do not apply (see 4.1.8.5 which makes 4.1.8.2 and all references contained therein inapplicable).

Maybe the concerns from ICAO could be met by inserting a reference to 4.1.1.1 in P650.

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