

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

Thirtieth session
Geneva, 4-12 (a.m.) December 2006
Item 2 (a) (ii) of the provisional agenda

PROPOSALS OF AMENDMENTS TO THE RECOMMENDATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Model Regulations on the Transport of Dangerous Goods

Transport of infectious substances – Bulk animal carcasses Comments on ST/SG/AC.10/C.3/2006/91

Transmitted jointly by the experts from the United Kingdom and the United States of America

Background

1. The experts from the United Kingdom and the United States of America have corresponded with respect to the issues identified in ST/SG/AC.10/C.3/2006/91 regarding the bulk transport of infected animal carcasses. After further consideration, it is believed that a simplified approach to the issues identified in the paper is preferable.
2. The existing Model Regulations do not adequately address the transport of animal carcasses containing Category B infectious substances in that there are no bulk packaging provisions assigned in the Dangerous Goods List for such materials. However, 4.3.2.4.1 currently authorizes animal carcasses containing Category A infectious substances affecting either humans and animals or animals only (UN 2814 and UN 2900, respectively) to be transported in bulk containers. Although only the UN 2900 entry is currently assigned the corresponding BK1 and BK 2 provisions in the Dangerous Goods List, this appears to be an oversight based on the current text of the bulk provisions in 4.3.2.4.1 which includes a reference to UN 2814. The full text of 4.3.2.4.1 is reproduced with suggested amendments in the proposal section of this paper.
3. As an alternative to creating new proper shipping names, this paper proposes the inclusion of bulk provisions for Category B infectious substances (UN 3373) in the same manner currently provided for Category A infectious substances (UN 2814 and UN 2900). The existing proper shipping names are adequate for describing infectious substances when contained in carcasses, body parts, or animal foodstuffs and have been utilized for such applications for some time. The carcasses, body parts and/or foodstuffs simply contain the infectious substances; while

their form in transport merits additional packaging provisions, the creation of new proper shipping names is not necessary. However, clarification to the bulk provisions to more specifically address infected animal foodstuff and animal body parts is necessary. The amendments are easily made as animal carcasses are specifically mentioned; thus, a precedent has been set for the use of bulk containers for such materials.

4. Substantive amendments to Part 2, Chapter 6 concerning the classification of infectious substances are not necessary. It is agreed however that a definition for animal material would preclude needless repetition of the term “animal carcasses, animal body parts, and animal foodstuff”. In addition, 2.6.3.6.2 could be deleted as the revised 4.3.2.4.1 would now address carcasses in Category A or B and preclude the need for a competent authority approval for the transport of animal carcasses in category B. This would not supersede or conflict with any approvals required by other national or international authorities. However, no mention of such approvals is made for Category A substances and it appears superfluous to make mention of it for the lower hazard Category B substances. The section heading should be revised accordingly as 2.6.3.6 would now apply only to live infected animals.
5. It is proposed to amend the entries in the Dangerous Goods List for UN 2814 and UN 3373 to include authorizations to use bulk containers by the addition of BK1 and BK2 to column (10). In addition, it is proposed that a new special provision be added to Chapter 3.2 and that the provisions for bulk transport of infectious substances in 4.3.2.4.1 be amended to more clearly address the requirements for animal material transported in bulk.

Proposal

1. **Add the following new definition to 1.2.1:**

Animal material means animal carcasses, animal body parts, or animal foodstuffs.

2. **Add a new special provision XXX to Chapter 3.3 as follows:**

XXX Bulk transport of infectious substances in BK1 and BK2 bulk containers is only permitted for infectious substances contained in animal material as defined in 1.2.1. See 4.3.2.4.1.

3. **Amend the entries for UN2814 and UN 3373 by adding BK1 and BK2 to column 10 of the Dangerous Goods List and add new Special Provision XXX to UN 2814, UN 2900, and UN 3373 as follows:**

UN No.	Name and description	Class or division	Subsidiary risk	UN packing group	Special provisions	Limited quantities	Packagings and IBCs		Portable tanks and bulk containers	
							Packing instruction	Special Packing provision	Instructions	Special provisions
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(1)	(2)
2814	INFECTIOUS SUBSTANCE, AFFECTING HUMANS	6.2			318 XXX	NONE	P620		BK1 BK2	
2900	INFECTIOUS SUBSTANCE, AFFECTING ANIMALS only	6.2			318 XXX	NONE	P620		BK1 BK2	
3373	BIOLOGICAL SUBSTANCE, CATEGORY B	6.2			319 XXX	NONE	P650		T1 BK1 BK2	TP1

4. Amend 4.3.2.4 as follows:

4.3.2.4 Bulk waste goods of Division 6.2

4.3.2.4.1 *Bulk transport of waste goods of animal material in Division 6.2*

~~4.3.2.4.1 Bulk waste goods of Division 6.2 (UN Nos. 2814, and 2900 (animal carcasses only))~~

4.3.2.4.1—Animal material containing infectious substances (UN Nos. 2814, 2900 and 3373) is authorized for transport in bulk containers provided the following conditions are met:

- (a) ~~For waste goods of UN Nos. 2814 and 2900, s~~Sheeted bulk containers BK1 are permitted provided that they are not filled to maximum capacity to avoid substances coming into contact with the sheeting. Closed bulk containers BK2 are also permitted;
- (b) Closed and sheeted bulk containers, and their openings, shall be leak-proof by design or by the fitting of a suitable liner;
- (c) ~~Waste goods of UN Nos. 2814 and 2900~~**The animal material** shall be thoroughly treated with an appropriate disinfectant before loading prior to transport;
- (d) ~~Waste goods of UN Nos. 2814 and 2900 in a s~~Sheeted bulk containers shall be covered by an additional top liner weighted down by absorbent material treated with an appropriate disinfectant;
- (e) Closed or sheeted bulk containers ~~used for the transport of waste goods of UN Nos. 2814 and 2900~~ shall not be re-used until after they have been thoroughly cleaned and disinfected.

6. Amend 2.6.3.6 as follows:

2.6.3.6 **Live** Infected animals

2.6.3.6.1 Unless an infectious substance cannot be consigned by any other means, live animals shall not be used to consign such a substance. A live animal which has been intentionally infected and is known or suspected to contain an infectious substance shall only be transported under terms and conditions approved by the competent authority.

~~2.6.3.6.2 Animal carcasses affected by pathogens of Category A or which would be assigned to Category A in cultures only, shall be assigned to UN 2814 or UN 2900 as appropriate.~~

~~Other animal carcasses affected by pathogens included in Category B shall be transported in accordance with provisions determined by the competent authority.~~
