

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

7 September 2010

Joint Meeting of the RID Committee of Experts and the

Working Party on the Transport of Dangerous Goods

Geneva, 13-17 September 2010

Item 5 (a) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: Pending issues

Comments on ECE/TRANS/WP.15/AC.1/2010/57: Introduction of a provision streamlining the transport of contaminated medical equipment

Transmitted by the United Kingdom

1. In their paper ECE/TRANS/WP.15/AC.1/2010/57 Germany comments that instruments which have been used for medical purposes can be assigned to the waste code 18 01 04 in accordance with the European Waste Catalogue (EWC). This means that they believe that these instruments are wastes which are not subject to special requirements in order to prevent infection. The assignment to 18 01 04 means that such instruments are exempt from RID/ADR/ADN through the provisions contained within Note 2 of 2.2.62.1.11.2 which states:

“Note 2: Notwithstanding the classification criteria set out above, medical or clinical wastes assigned to number 18 01 04 ... according to the list of wastes annexed to the Commission Decision 2000/532/EC as amended, are not subject to the provisions of ADR.” (See Appendix to this paper for an extract of the EWC relating to medical waste)

2. The United Kingdom questions this assignment to 18 01 04 if, as stated in paragraph 6 of their paper, Germany acknowledges that the risk of infection from these instruments can't be eliminated completely. If they are 18 01 04 they are exempt from transport regulations and the proposal submitted by Germany is unnecessary.

3. We believe that any medical equipment which has been used for medical purposes has to be sterilized before it can be used again and prior to sterilization poses a small risk of infection. This means therefore that we believe that assignment to EWC 18 01 03 is appropriate as the sterilization is the procedure that nullifies the hazard.

4. As mentioned at the March Joint Meeting, in transport the United Kingdom treats operating theatre tools/medical equipment which has been used for medical purposes as UN 3291 Clinical Waste, Unspecified, N.O.S. The reason we classify them as such is because we believe that there is a small risk of infection from this equipment in transport and this classification is in accordance with the provisions of 2.2.62.1.11.2 of RID/ADR/ADN. We therefore do not believe that there is any need for further provision for these items in RID/ADR/ADN.

5. However, if it is the agreement of the Joint Meeting that additional text is needed to cover these items in transport then the UK would like to suggest an alternative proposal which we feel would ensure that there are adequate packaging provisions. We believe that

this option would enable the transport of these items in a safe manner whilst not subjecting them to unnecessary and onerous requirements of RID/ADR/ADN.

Proposal

6. Insert a new entry into Table B: Alphabetic index of substances and articles of RID/ADR/ADN as follows:

“Soiled Medical Equipment, see UN 3291”

7. Insert new entries for special packing provisions in column (9a) of Table A in Chapter 3.2 against the entry for UN 3291, Clinical Waste, Unspecified, N.O.S. as follows:

Packing instructions	Special packing provisions
4.1.4	4.1.4
(8)	(9a)
P621	RRXX
IBC620	BBXX
LP621	LLXX

8. Add special packing provisions specific to RID and ADR in packing instructions P621, IBC620 and LP621 as follows:

RRXX (or BBXX or LLXX as appropriate) Soiled medical equipment (such as surgical instruments which have been used for medical procedures) that, after use and before their subsequent reuse, is transported to a place of disinfection, cleaning or sterilisation is not subject to the other provisions of RID/ADR if it is packed in rigid, puncture resistant, metal or plastics packagings meeting the requirements of this special packing provision. Measures shall be taken to prevent leakage. These packagings shall be capable of meeting the general packaging requirements of 4.1.1.1 and 4.1.1.2.

Packages packed in accordance with this provision shall be clearly marked “SOILED MEDICAL EQUIPMENT”. When using overpacks, these shall be marked in the same way, except when the marking remains visible.

This provision shall not apply to medical equipment containing infectious substances in Category A. These shall be assigned, as appropriate, to UN 2814 or UN 2900. This special packing provision shall not apply to medical equipment containing other dangerous goods that meet the definition of another class.

Consequential amendment – 4.1.3.1

9. If this proposal is adopted a consequential amendment will be required to the text contained within the second paragraph of 4.1.3.1 which details the alphanumeric codes designated to special packing provisions. New text is underlined:

““L” for large packagings or “LL” for special packing provisions specific to RID and ADR.”

Justification

10. This alternative proposal allows for these items to be transported safely under packaging provisions contained within RID and ADR but the measures introduced to mitigate the risk from these items reflects the relatively minimal safety risk posed from these items during transport.

Appendix

Hazardous waste is defined in the EWC (European Waste catalogue) as any waste number with an asterisk against it. Below is an extract from the waste catalogue relating to medical waste, mainly Class 6.2. All the asterisked numbers below will attract a UN number.

European Waste Catalogue
18 00 00 WASTES FROM HUMAN OR ANIMAL HEALTH CARE AND/OR RELATED RESEARCH (except kitchen and restaurant wastes not arising from immediate health care)
18 01 00 wastes from natal care, diagnosis, treatment or prevention of disease in humans
18 01 02 sharps (except 18 01 03)
18 01 02 body parts and organs including blood bags and blood preserves (except 18 01 03)
18 01 03* wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 01 04 wastes whose collection and disposal is not subject to special requirements in order to prevent infection (for example dressings, plaster casts, linen, disposable clothing, diapers)
18 01 06* chemicals consisting of or containing dangerous substances
18 01 07 chemicals other than those mentioned in 18 01 06
18 01 08* cytotoxic and cytostatic medicines
18 01 09 medicines other than those mentioned in 18 01 08
18 01 10* amalgam waste from dental care
18 02 00 wastes from research, diagnosis, treatment or prevention of disease involving animals
18 02 01 sharps (except 18 02 02)
18 02 02* wastes whose collection and disposal is subject to special requirements in order to prevent infection
18 02 03 wastes whose collection and disposal is not subject to special requirements in order to prevent infection
18 02 05* chemicals consisting of or containing dangerous substances
18 02 06 chemicals other than those mentioned in 18 02 05
18 02 07* cytotoxic and cytostatic medicines
18 02 08 medicines other than those mentioned in 18 02 07