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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

Forty-seventh session
Geneva, 22–26 June 2015
Item 3 of the provisional agenda
Listing, classification and packing

Packaging requirements for infectious waste of UN No. 3291

Transmitted by the expert from Switzerland[1]

Introduction

1. Following the discussions on European land transport at the RID/ADR/ADN Joint Meeting in March 2015, it was considered necessary to clarify the part of the Model Regulations addressing packaging requirements for the transport of medical or clinical waste (UN No. 3291, Division 6.2).

2. The opinion of the Joint Meeting was that waste assigned to this entry should be transported in approved packagings conforming to a design type.

3. Packing instruction P621 requires packagings for UN No. 3291 to meet the general provisions of 4.1.1. Under 4.1.1.3, the packagings listed in that instruction should conform to a design type proved to meet the test requirements of sections 6.1.5 or 6.3.5.

4. However, the title for Chapter 6.1, which reads "Requirements for the construction and testing of packagings (other than for Division 6.2 substances)" and the titles for Chapters 6.3 and 6.3.1.1, which refer exclusively to Category A, suggest that packagings for UN No. 3291 are not required to meet the provisions of sections 6.1.5 and 6.3.5, because section 4.1.1.3 applies, "Unless otherwise provided elsewhere in these

[1] In accordance with the programme of work of the Sub-Committee for 2015–2016 approved by the Committee at its seventh session (see ST/SG/AC.10/C.3/92, para. 95 and ST/SG/AC.10/42, para. 15).

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Regulations". The exclusion of Division 6.2 from Chapter 6.1 and of Category B from Chapter 6.3 does indeed contradict the provision.

5. In P621, the requirement to meet the performance test conditions outlined in Part 6 is specified only in the additional requirement for sharp objects, which refers to Chapter 6.1. Since packagings for the entry under UN No. 3291 containing sharp objects are subject to what we may assume to be a more restrictive provision and are required to be approved and to conform to a design type, it would seem appropriate to subject all packagings for this entry, regardless of whether they contain sharp objects, to the performance test conditions and conditions of approval stipulated in the additional requirement, that is, those of Chapter 6.1, not those of Chapter 6.3.

6. We propose aligning the introductory text of P621 with that of P620, by making reference, however, to Chapter 6.1.

7. It should be noted that the Model Regulations are clear in respect of the requirements that apply to intermediate bulk containers and large packagings (packing instructions IBC620 and LP621, Chapters 6.5 and 6.6, respectively).

Proposal

8. In packing instruction P621, after the first sentence of the second cell, which reads "The following packagings are authorized provided that the general provisions of 4.1.1 except 4.1.1.15 and 4.1.3 are met", insert the following sentence:

"Packagings meeting the requirements of Chapter 6.1 and approved accordingly consisting of:"