

## 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

23 November 2015

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Item 6 (c) of the provisional agenda

### Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: packagings

## Packagings for infectious substances – Comments on ST/SG/AC.10/C.3/2015/48

### Transmitted by the expert from Germany

### Introduction

1. The expert from Germany supports the proposals in document ST/SG/AC.10/C.3/2015/48 and is in favour of adopting amendments to the provisions for packagings for infectious wastes of Category A. The proposals were studied carefully with several experts and some issues were identified which could be further improved.

- In the proposed amendment to P 620 an editorial improvement should be included to make clear, that receptacle means the primary receptacle and packaging refers to the secondary packaging.
- It should be clarified which kind of waste the packaging is intended for. This definition should be adapted to the actual need for such transports. It is a packaging for solid wastes. However, this might also include adsorbed liquids on solid materials and even smaller receptacles containing liquids. In case of serious disease outbreaks, like Ebola, the handling for the waste should be not too complicated and the waste packaging should be allowed to be used also for articles with small amounts of liquids or residues of liquids, like sample tubes or injections. A complicate handling in hospitals and laboratories with different packagings for different type of waste should be avoided.
- It should be considered if the marking could be simplified. The maximum gross mass is an important information for standardized industrial procedures, but for medical staff using this packaging for waste it will usually be not possible to ascertain the actual mass. Consequentially it is proposed to mark the packages with the text “PACKAGING FOR SOLID WASTE ONLY” If the subcommittee prefers to follow the Norwegian proposal for a marking it should consider to include an additional requirement in 6.3.4.2 (d) to use the letter “S” indicating that the packaging is intended to contain solid wastes as follows:



4G/CLASS 6.2/15/S/06

S/SP-9989-ERIKSSON

## Proposal

2. The following modifications of the Norwegian documents (printed in red and bold) are suggested:

P620:

“3. Whatever the intended temperature of the consignment, the primary receptacle or the secondary packaging shall be capable of withstanding without leakage an internal pressure producing a pressure differential of not less than 95 kPa ~~and. This~~ **primary** receptacle or **secondary** packaging shall also be capable of withstanding temperatures in the range -40 °C to +55 °C.”

Definition of waste:

“6.3.5.2.1 Samples of each packaging shall be prepared as for transport except that a liquid or solid infectious substance shall be replaced by water or, where conditioning at -18 °C is specified, by water/antifreeze. Each primary receptacle shall be filled to not less than 98 % of its capacity.

For packagings intended to contain waste, the primary receptacles may alternatively be filled to the maximum gross mass in kilograms at which they may be used.

**For the purpose of this paragraph „waste“ means solid waste and mixtures of solid and liquid waste, provided that there is no free liquid visible at the time at the time the waste is loaded. Articles, containing liquids, with a maximum net quantity of [100 ml] [200ml] also maybe contained in the waste if the inner packaging contains sufficient absorbent material to absorb the entire amount of liquids. Examples of such articles are sample tubes, injections or small bottles.**

Marking:

(a) ~~Insert a new paragraph, so that the new 6.3.4.2 (d) would read as follows:~~

(d) ~~For packagings intended to contain waste, the maximum gross mass in kilograms; this may be omitted when each primary receptacle has been tested with water or water/antifreeze to not less than 98% of its capacity;~~

(b) ~~The remaining entries of the list in 6.3.4.2 would change from (d) (g) to (e) (h) respectively.~~

(e) ~~In subsection 6.3.4.3, delete 6.3.4.2 (a) to (g); add 6.3.4.2 (a) to (h);~~

(d) ~~Subsection 6.3.4.4 including a new example of marking would read as follows:~~

### 6.3.4.4 Examples of marking



4G/CLASS 6.2/06 ~~as in 6.3.4.2 (a), (b), (c) and (e)~~  
S/SP 9989 ERIKSSON ~~as in 6.3.4.2 (f) and (g)~~



4G/CLASS 6.2/15/06 ~~as in 6.3.4.2 (a), (b), (c), (d) and (e)~~  
S/SP 9989 ERIKSSON ~~as in 6.3.4.2 (f) and (g)~~

- (e) ~~6.3.5.1.6 g)~~ would have the following amendment: "In addition to the marks prescribed in 6.3.4.2 (a) to (f)~~(g)~~, packagings shall be marked in accordance with 6.3.4.2 ~~(g)~~(h)."

**6.3.4.2 Add a new sub-paragraph (h) as follows:**

**“(h) For packagings for waste meeting the requirements of 6.3.5.2.1 the text:  
“PACKAGING FOR SOLID WASTE ONLY”**

**6.3.4.3 Amend the beginning of the first sentence to read as follows:**

**“6.3.4.3 Marks shall be applied in the sequence shown in 6.3.4.2 (a) to (h); ...”**

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