

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

3 December 2015

Forty-eight session

Geneva, 30 November-9 December 2015

Item 3 of the provisional agenda

Listing, classification and packing

Packagings for infectious substances

Comments on informal document INF.30

Transmitted by the expert from Norway

Introduction

Norway welcomes Germany's document submitted 23rd November (INF.30) on packagings for infectious substances, and has the following comments to the proposals:

- Having a closer specification in P620, paragraph 3, that the receptacle means the primary receptacle and the packaging refers to the secondary packaging will make the text even clearer.
- It would be beneficial to describe the type of waste these packagings are intended for, however we do believe that introducing a definition of waste only applicable to Chapter 6.3 on testing of packagings is not ideal. Using the already existing definition of medical and clinical wastes in 2.6.3.5.1 may be a better solution. For *other than solid infectious substances*, packing instruction P620 already requires absorbent material in sufficient quantity to absorb the entire contents. The amount of liquids that can be transported in a packaging containing Category A waste will therefore be naturally limited. However, we believe it could be a good option to add another special requirement to P620 (similar to the special requirement in P621) applicable for packagings intended to contain sharp objects like broken glass and needles.
- We agree that some additional text on the packagings could make routines easier for medical staff. However, we believe that marking packagings with the text "PACKAGING FOR SOLID WASTE ONLY" could in fact be more confusing than the text "PACKAGING FOR WASTE ONLY" – especially if the intention is to dispose of small receptacles containing liquids, together with solid wastes and mixtures of solid and liquid wastes as suggested by Germany. We are still of the opinion that the maximum gross mass should be included in the UN code, as this information is important to hospital safety advisors, purchasers and auditors. Otherwise, packagings tested with different masses could look identical. In addition to the mass, Norway is in favour of including the capital "S" in the UN code as suggested by Germany. P620 does not allow for "free" liquids, but the "S" denotes that the packaging is for solids or leakproof inner primary receptacle(s) in line with the provisions in Chapter 6.1.

Amended Proposal

1. To clarify that the requirements relating to pressure differentials and temperatures in P620 should be considered independent to each other, Norway proposes to split paragraph 3 into two sentences (old text ~~stricken through~~, new text underlined, added text in **bold**):

*“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.**”*

2. Norway suggests adding a new special requirement 6. to packing instruction P620 concerning packagings intended to contain sharp objects:

6. Packagings intended to contain sharp objects such as broken glass and needles shall be resistant to puncture and retain liquids under the performance test conditions in Chapter 6.3.

3. Norway proposes to introduce the option of separating waste classified as UN 2814 or UN 2900 from a liquid or solid infectious substance as described in subsection 6.3.5.2.1 on the preparation of packagings for testing. This option would entail testing the packagings intended for waste transport with a maximum gross mass. Introducing a definition for waste only applicable to the aforementioned paragraph in Chapter 6.3 should be avoided. Norway therefore suggests that subsection 6.3.5.2.1 would read as follows (new text underlined, added text in **bold**):

*“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 for the carriage of medical or clinical wastes containing Category A infectious substances, the primary receptacles may alternatively be filled to the maximum gross mass in kilograms at which they may be used.**”*

To distinguish packagings intended for waste transport from packagings where the primary receptacles have been tested with water or water/antifreeze up to 98 % of their capacity, Norway proposes to include the maximum gross mass in kg and the capital letter "S" between the entries of "CLASS 6.2" and the year of manufacture.

The following amendments including consequential amendments are proposed:

- (a) Insert two new paragraphs, so that the new 6.3.4.2 (d) and (e) 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;*
 - (e) For packagings intended to contain waste, the letter "S" denoting that the packaging is intended for the transport of solids or leakproof inner primary receptacle(s); 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 (f) – (i) respectively.
- (c) In subsection 6.3.4.3, delete 6.3.4.2 (a) to (g); add 6.3.4.2 (a) to (i);
- (d) Subsection 6.3.4.4 including a new example of marking would be amended as below:

6.3.4.4 Examples of marking

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

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

(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)~~(h), packagings shall be marked in accordance with 6.3.4.2 ~~(e)~~(i)."
