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Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Bern, 23-27 March 2015

Item 5 (a) of the provisional agenda

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

Approval of packagings for infectious substances

Transmitted by the Government of Switzerland^{1, 2}

Summary

- Executive summary:** Packagings for the carriage of infectious substances of category A must conform to an approved design type. A contradiction to this principle has been found in paragraph 4.1.8.2.
- Packagings for the carriage of UN 3373 (Biological substance, category B) need not conform to an approved design type, while this is required for UN 3291 (Clinical/medical waste)..
- Action to be taken:** Amend paragraph 4.1.8.2.
- Discuss the requirements applicable to the carriage of UN 3373 and UN 3291.
- Related documents:** ECE/TRANS/WP.15/AC.1/2014/28, informal documents INF.15, INF.33 and INF.48 of the September 2014 session.

¹ In accordance with the programme of work of the Inland Transport Committee for 2014–2015 (ECE/TRANS/240, para. 100, ECE/TRANS/2014/23, cluster 9, para.9.2).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2015/9.

I. Introduction

1. At the March 2014 session of the Joint Meeting, Switzerland raised the issue of requirements for packagings used for the carriage of infectious substances (UN Nos. 2814, 2900, 3373 and 3291) and pointed out a possible mistake in paragraph 4.1.8.2. The Joint Meeting noted that the text in RID/ADR differed from that in the United Nations Model Regulations and advised to check the origin of the text in RID/ADR (ECE/TRANS/WP.15/AC.1/2014/28 and ECE/TRANS/WP.15/AC.1/134, par. 47).

2. After some research and discussion by the informal working group on carriage of live animals (informal document INF.15, September 2014), Switzerland transmitted informal documents INF.33 and INF.48 for consideration at the September 2014 session. These documents could not be considered due to lack of time.

3. In the present document Switzerland is providing additional information and is submitting a formal proposal of amendment to 4.1.8.2 relating to substances of category A. We also would like the Joint Meeting to give his opinion on the requirements for the carriage of substances of category B and clinical/medical wastes.

II. Infectious substances of category A

4. According to packing instruction P620, infectious substances of category A (UN 2814 and UN 2900) must be packed in approved packagings meeting the requirements of chapter 6.3. In addition, the special packing provisions of section 4.1.8 apply.

5. While chapter 6.3 clearly requires the packagings to conform to an approved design type (UN approved packagings), paragraph 4.1.8.2 does not appear to be clear. The first sentence reads "The definitions in 1.2.1 and the general requirements of 4.1.1.1 to 4.1.1.17, except 4.1.1.3, 4.1.1.9 to 4.1.1.12 and 4.1.1.15 apply to infectious substances packages". This is rather confusing as the exempted paragraphs 4.1.1.3 and 4.1.1.9 are dealing with the conformity of packagings to a design type.

6. Existing paragraph 4.1.8.2 was formulated for the RID/ADR 2003 after a modification of provisions for infectious substances in the twelfth revised edition of the United Nations Model Regulations. However, the text adopted by the Joint Meeting in March 2002 for the RID/ADR differed from that in the United Nations Model Regulations due to the adoption of informal document INF.45 (see TRANS/WP.15/AC.1/88, paras. 35-45 and annex 1).

7. INF.45 was drafted to solve an issue relating to receptacles of Class 2. We think that it was drafted without taking into account an amendment to 4.1.8.2 previously adopted by the Joint meeting in September 2001 (TRANS/WP.15/AC.1/86/Add.2). Therefore we propose correcting this inconsistency and aligning 4.1.8.2 of RID/ADR with the text of the United Nations Model Regulations.

Proposal

8. Amend the first sentence of 4.1.8.2 as follows:

"The definitions in 1.2.1 and the general requirements of 4.1.1.1 to 4.1.1.17, except ~~4.1.1.3, 4.1.1.9~~ **4.1.1.10** to 4.1.1.12 and 4.1.1.15 apply to infectious substances packages."

III. Biological substances, category B and clinical/medical waste

9. Biological substances, category B (UN 3373) shall be packed according to packing instruction P650, which requires:

- the packaging to consist of at least three components;
- the completed package to be capable of successfully passing the drop test in 6.3.5.3; and
- the display of a specific mark on the package.

This instruction does not require the use of UN approved packagings, nor the application of other provisions of RID/ADR.

10. Conversely, clinical and medical wastes (UN 3291) must be packed in UN approved packagings according to packing instructions P621, IBC620 and LP621 or, when carried in bulk, be contained in UN approved plastic bags according to 7.3.2.6.2. The other provisions of RID/ADR apply.

11. In our opinion, there should not be any difference in the requirements for UN 3373 and UN 3291. We believe that UN 3373 and UN 3291 present similar hazard characteristics. They often contain the same material and therefore we could expect the same carriage conditions.

Discussion

12. In view of the different opinions expressed in March 2014 and during the informal working group on carriage of live animals, Switzerland would like the Joint Meeting to answer the following questions:

- Is there a justification to require clinical and medical wastes to be carried in UN approved packagings, while this is not required for biological substances, category B (UN 3373)?
- Should existing requirements be amended? For instance, should we require UN approved packagings only for category A substances (UN 2814 and UN 2900)?

13. If the Joint meeting thinks there is a need for amending the existing requirements, then this issue should be transmitted to the UN Sub-Committee of Experts on the Transport of Dangerous Goods..
