

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

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Item 3 of the provisional agenda

Listing, classification and packing

Comments on ST/SG/AC.10/C.3/2016/9: Packagings for infectious substances – revised proposal

Transmitted by the expert from Norway

Introduction

1. Norway welcomes document 2016/9 from Germany on packagings for infectious substances and sees it as a further step towards approving larger packagings for Division 6.2 Category A substances.
2. The new text proposed by Germany in 6.3.5.2.1 requires separate tests for packagings of all sizes with primary receptacles intended for the transport of both liquids and solids. Norway is of the opinion that performing only one test with liquids should be kept as an option for all packagings, as this test has been described as the most conservative and the most difficult to pass. Requiring separate tests for packagings constructed for both liquids and solids is common for other divisions of dangerous goods; however, this has not been the case for Division 6.2 Category A substances, as P620 already requires sufficient absorbent material in the inner packagings (consisting of primary receptacle(s) and a secondary packaging) to absorb the entire amount of liquids present.
3. Germany also proposes to allow placing absorbents in primary receptacles containing liquids, and that packagings approved for the transport of solids only, may be used provided the receptacles contain sufficient absorbent materials to absorb the entire contents. Norway supports this proposal. In order to simplify and make P620 (a) (iii) easier to read, the text describing this option has been moved out of (a) (iii) and placed below (b).
4. Norway sees no reason to remove the existing filling requirement of not less than 98% for the primary receptacles, when packagings are tested with water or water/antifreeze. In Norway's view, the "maximum permissible gross mass" for a packaging tested with liquids, but with no maximum mass specified in the UN code, could perhaps be open to interpretation.
5. Rather than using the terms "liquid infectious substance", "solid infectious substance" and "articles" (in this case also infected), we propose to use only "liquids" and "solids" in accordance with the definitions in 1.2.1. This way, *solids* will cover both solid infectious substances and articles in P620 and Chapter 6.3:

Liquid means a dangerous good which at 50 °C have a vapour pressure of not more than 300 kPa (3 bar), which is not completely gaseous at 20 °C and at a pressure of 101.3 kPa, and which (...);

Solid means a dangerous good, other than a gas, that does not meet the definition of liquid in this section;

6. The proposals in document 2016/9 for 6.3.4.2 – 6.3.4.4 are reproduced in this document with some small amendments. There are no changes to the proposal relating to capability requirements on pressure and temperature in P620.

Proposal

Amend the text of P620 to read as follows (new text underlined, old text ~~stricken through~~):

The following packagings are authorized provided that the special packing provisions of **4.1.8** are met:

Packagings meeting the requirements of Chapter 6.3 and approved accordingly consisting of:

- (a) Inner packaging comprising:
 - (i) leakproof primary receptacle(s);
 - (ii) a leakproof secondary packaging;
 - (iii) ~~other than for solids, infectious substances, an absorbent material in sufficient quantity to absorb the entire contents placed between the primary receptacle(s) and the secondary packaging~~ sufficient absorbent material to absorb the entire contents; if multiple primary receptacles are placed in a single secondary packaging, they shall be either individually wrapped or separated so as to prevent contact between them;
- (b) A rigid outer packaging:
 - Drums (1A1, 1A2, 1B1, 1B2, 1N1, 1N2, 1H1, 1H2, 1D, 1G);
 - Boxes (4A, 4B, 4N, 4C1, 4C2, 4D, 4F, 4G, 4H1, 4H2);
 - Jerricans (3A1, 3A2, 3B1, 3B2, 3H1, 3H2).

The smallest external dimension shall be not less than 100 mm.

Provided sufficient absorbent material is placed in the primary receptacle(s) to absorb the entire amount of liquids present, a packaging approved for solids only according to 6.3.5.2.1 (b) (ii) may be used.

Substitute sub-section 6.3.5.2.1 with the following text:

6.3.5.2.1 Samples of each packaging shall be prepared as for transport, except that infectious substances shall be replaced by the following:

- (a) Liquids shall be replaced by water or, where conditioning at -18 °C is specified, by water/antifreeze and each primary receptacle shall be filled to not less than 98 % of its capacity.
- (b) Solids shall be replaced by:
 - (i) Water or, where conditioning at -18 °C is specified, by water/antifreeze and each primary receptacle shall be filled to not less than 98 % of its capacity; or
 - (ii) Substances or articles which have the same physical characteristics (mass, particle size, mass density, etc.) as the solids to be carried, and which do not falsify

the test results. Each primary receptacle shall be filled to its maximum permissible gross mass.

For packagings designed for the transport of solids only, performing the test in (b) (ii) is sufficient.

Amend the proposals in 2016/9 for 6.3.4.2 - 6.3.4.4 as follows (new text underlined, old text ~~stricken through~~):

Insert two new paragraphs 6.3.4.2 (d) and (e):

“(d) For packagings tested for solids ~~infectious substances~~ only according to 6.3.5.2.1 (b) (ii), the maximum gross mass in kilograms;

(e) For packagings tested for solids ~~infectious substances~~ only according to 6.3.5.2.1 (b) (ii), the letter "S";”

The remaining entries of the list in 6.3.4.2 change from (d) – (g) to (f) – (i) respectively.

In 6.3.4.3, replace “6.3.4.2 (a) to (g)” with “6.3.4.2 (a) to (i)”.

Amend 6.3.4.4 as follows:

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

In 6.3.5.1.6 (g) replace "6.3.4.2 (a) to (f)" with "6.3.4.2 (a) to (h)" and "6.3.4.2 (g)" with "6.3.4.2 ~~(h)~~(i)"