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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**
(Twentieth session, 3-12 December 2001,
agenda item 4)

TRANSPORT OF SOLID SUBSTANCES IN BULK IN CONTAINERS

Carriage of infectious substances in bulk

Transmitted by the expert from the United Kingdom

Introduction

1. At the July 2001 session of the Sub-Committee of Experts on the Transport of Dangerous Goods the expert from the United Kingdom presented Information Paper 25 which proposed the provisions for the transport in bulk of infectious substances, UN 3291 and UN 2900. This paper was referred by the plenary to a lunchtime working group on substances in bulk, but was not reached. As mentioned in paragraph 4 of the introduction to the joint proposal produced by the United Kingdom and Germany on the transport of solid substances in bulk, ST/SGAC.10/C.3/2001/37, this subject is being presented in a separate proposal as outlined below.

Background

2. Current requirements for the packaging of UN 2900 and UN 3291 are addressed in Chapter 6.3 of the Model Regulations. There are no provisions for the transport of these substances in bulk. Recent experience in the United Kingdom suggests that while the existing Model Regulations may be sufficient for transporting most substances assigned to UN 2900 in normal everyday circumstances, they are insufficient when, for example, large quantities of animal carcasses need to be transported in exceptional circumstances in a short space of time.

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3. The prime concern in the transport of any infectious substance is the risk of the spread of infection. That could occur not only as a result of a transport incident but also during normal conditions of transport where circumstances such as the substance not being sufficiently enclosed could allow the spread of infection to either humans or animals.

4. In the case of UN 2900, however, the expert from the United Kingdom believes that the proposals suggested in ST/SG/AC.10/C.3/2001/37 would offer sufficient protection against any risks associated with such transport. Recent experience suggests that these substances could therefore be safely transported in bulk containers.

5. Similarly it has been an increasingly common practice in recent times in UK national transport to permit the transport of UN 3291 Clinical Waste collected in plastics sacks, by road in freight containers. The expert from the UK believes that the current proposals for solid substances in bulk would adequately address necessary safety requirements for such transport. However for UN 3291 in plastics sacks, since there is arguably no need to also require a liner in a freight container, the UK proposes to amend the first sentence of 6.8.3.1.2 to obviate the need for a liner.

6. In the case of both UN 2900 and UN 3291 there may be an additional hazard from residual liquids emanating from the material carried. It would be necessary therefore to ensure that bulk containers are leakproof.

Proposal

7. Add a new paragraph 4.3.2.4 in the proposal in paper ST/SG/AC.10/C.3/2001/37 for UN 2900 and UN 3291;

"4.3.2.4 Bulk Goods of Division 6.2

Only closed bulk containers (code [BK]2) may be used.

These goods should be transported in bulk containers in which the openings used for loading and unloading are capable of being leakproof when closed."

Renumber the subsequent paragraphs in 4.3.2.4

8. Add UN 2900 and UN 3291 to the list in Annex 2 of ST/SG/AC.10/C.3/2001/37.

Consequential Amendments to the proposals in paper ST/SG/AC.10/C.3/2001/37

9. Add ", 6.2" after "5.1" in the title of 4.3.2. both in the body of the text and in 2a) Proposals. The titles to 4.3.2.1, 4.3.2.2 and 4.3.2.3 "Class" should read "Division".

10. Amend the first sentence of 6.8.3.1.2 as follows:

"Unless it can be demonstrated that the bulk container is capable of retaining the intended contents as constructed, bulk containers shall include a liner made of suitable material."

UN No.	Name and description	Class or division	Subsidiary risk	UN packing group	RID/ADR	IMO	CFR	D	Bulk container types
(1)	(2)	(3)	(4)	(5)					
2900	INFECTIOUS SUBSTANCE AFFECTING ANIMALS only	6.2							[BK]2
3291	CLINICAL WASTE, UNSPECIFIED, N.O.S., or (BIO) MEDICAL WASTE, N.O.S. or REGULATED MEDICAL WASTE,NOS	6.2		II					[BK]2