

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

Thirty-third session
Geneva, 30 June-9 July (a.m.) 2008
Item 3 of the provisional agenda

PERFORMANCE OF PACKAGINGS, INCLUDING IBCs

Chapter 4.1

Transmitted by the expert from France

1. In the Fourteenth revised edition of the Model Regulations, the provisions of 4.1.1.15. regarding the period of use of five years for plastics drums and jerricans, rigid plastics and composite IBCs with plastics inner receptacles did not apply to packagings used for the transport of UN 3291. This exemption was laid down in 4.1.8.2.
2. In the Fifteenth revised edition of the Model Regulations, sub-section 4.1.8 and 4.1.8.2 have been amended and do not apply any more to UN 3291.
3. As a consequence and as required by P621 and IBC620, all existing and new plastics drums and jerricans, rigid plastics and composite IBCs with plastics inner receptacles used for the transport of UN 3291 will have to conform to 4.1.1, including 4.1.1.15, when the amendments of the 15th Modal regulations will enter into force through modal regulations. It implies that all packagings of five years or more as described in 4.1.1.15 will not be authorized any more to transport clinical wastes unless otherwise approved by the competent authority.
4. The expert from France does not recall any discussion within the sub-committee on this issue when revising sub-section 4.1.8 and thinks that this situation will lead to a number of queries to competent authorities.

Proposal

5. Given the fact that this change does not appear as a conscious decision and that the goods carried (clinical wastes) are not of such nature that they are liable to affect plastics, the expert from France proposes to exempt packagings used for UN 3291 from the application of 4.1.1.15 as follows (new text is underlined) :

- 1 In P621, amend the second sentence to read :

"The following packages are authorized provided that the general provisions of 4.1.1, except 4.1.1.15, and 4.1.3, are met :"

2 In IBC620, amend the second sentence to read :

"The following packages are authorized provided that the general provisions of 4.1.1, except 4.1.1.15, and 4.1.3, are met :"

6. The sub-committee is invited to consider this proposal and, if necessary, to draw the attention of modal bodies on its decision as soon as possible. If the sub-committee is of the opinion that this 5 years period of use is needed, it would at least be necessary to introduce a transitional period.
