



**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****Forty-fifth session**

Geneva, 23 June – 2 July 2014

Item 7 (c) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: used medical devices****Used medical devices or equipment****Transmitted by the Council on Safe Transportation of Hazardous
Articles (COSTHA)¹****Introduction**

1. During the forty-second, forty-third and forty-fourth sessions of the Sub-Committee, COSTHA has submitted documents addressing difficulties with implementing the exceptions noted in 2.6.3.2.3.9. Specifically, the requirement for the package to be capable of withstanding a 1.2 m drop test is problematic. Proving capability is difficult.
2. In parallel discussions, the International Civil Aviation Organization (ICAO) has voiced concern over the potential amount of free liquid which could be contained within a large used medical device. While free liquid contaminated with a Category A infectious substance would not be permitted under the exception, free liquid meeting the criteria for Category B would be permitted.
3. During the forty-fourth session, the Sub-Committee discussed the need to address both issues in a way that does not change the intent of the existing exception in 2.6.3.2.3.9, but also allows for large equipment to be excepted from a drop test capability and addresses the issue of free liquids contaminated with Category B.
4. To address these issues, COSTHA proposes the following changes to Packing Instruction P650.

¹ In accordance with the programme of work of the Sub-Committee for 2013-2014 approved by the Committee at its sixth session (refer to ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

Proposal

5. Materials which are contaminated with Category B infectious substances would need to be packed and offered as UN3373. This would include equipment known to contain free liquid meeting the definition of a Category B Infectious Substance. Providing a packaging exception in P650 for such equipment would maintain hazard communication while allowing for equipment to provide adequate protection as packaging.

6. COSTHA proposes to introduce a new paragraph (10) in P650 as follows. All subsequent paragraphs would be renumbered as appropriate):

“(10) For equipment containing liquid or solid substances

- (a) The equipment may be considered a primary receptacle if all openings which could release the material are sealed to prevent leakage;
- (b) The secondary packaging shall be leakproof;
- (c) Equipment packed in this manner is not subject to:
 - i. The rigid secondary or outer packaging requirement of paragraph (2); or
 - ii. The drop test requirement of paragraph (6).

(40-11) When packages are placed in an overpack.”
