



**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-eighth session**

Geneva, 30 November – 9 December 2015

Item 6 (c) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: packagings****Packagings for infectious substances****Transmitted by the expert from Norway¹****Introduction**

1. After presenting informal document INF.20 at the forty-seventh session concerning interpretations relating to pressure differential and temperature requirements in packing instructions P620 and P650, several delegates commented on these issues. In addition, some spoke up about the difficulties they had encountered in the process of approving larger packagings for UN 2814 and UN 2900. Originally, the test requirements in Chapter 6.3 were designed for small receptacles, and not for large packagings intended to dispose of voluminous waste like contaminated textiles and protective equipment. The 9 meter drop test was put forward as the biggest obstacle to successfully approving a packaging when each primary receptacle has to be filled with water or water/antifreeze to not less than 98 % of its capacity. Based on the description in 6.3.5.2.1, most delegates appeared to be of the opinion that this requirement has to apply to all packagings, including the ones intended for waste transport. Norway would like to propose a few changes to the current text, which would ease and facilitate the approval of larger packagings intended for the transport of waste classified as UN 2814 and UN 2900.

¹ In accordance with the programme of work of the Sub-Committee for 2015-2016 approved by the Committee at its seventh session (refer to ST/SG/AC.10/C.3/92, paragraph 95 and ST/SG/AC.10/42, para. 15).

Proposal

2. To clarify that the requirements relating to pressure differentials and temperatures in P620 should be considered independent to each other, Norway proposes to split paragraph 3 into two sentences (old text ~~stricken through~~, new text underlined):

“3. Whatever the intended temperature of the consignment, the primary receptacle or the secondary packaging shall be capable of withstanding without leakage an internal pressure producing a pressure differential of not less than 95 kPa ~~and. This receptacle or packaging shall also be capable of withstanding~~ temperatures in the range -40 °C to +55 °C.”

3. Norway proposes to introduce the option of separating *waste* classified as UN 2814 or UN 2900 from *a liquid or solid infectious substance* as described in subsection 6.3.5.2.1 on the preparation of packagings for testing. This option would entail testing the packagings intended for waste transport with a maximum gross mass. Norway suggests that subsection 6.3.5.2.1 would read as follows (new text underlined):

“6.3.5.2.1 Samples of each packaging shall be prepared as for transport except that a liquid or solid infectious substance shall be replaced by water or, where conditioning at -18 °C is specified, by water/antifreeze. Each primary receptacle shall be filled to not less than 98 % of its capacity. For packagings intended to contain waste, the primary receptacles may alternatively be filled to the maximum gross mass in kilograms at which they may be used.”

4. To distinguish the packagings where each primary receptacle has been tested with a maximum mass, from the packagings where the primary receptacles have been tested with water or water/antifreeze up to 98 % of their capacity, we suggest introducing a change to the UN mark for the packagings intended for waste transport. We propose inserting the maximum gross mass in kg between the entries of "CLASS 6.2" and the year of manufacture.

5. The following amendments including consequential amendments are proposed:

- (a) Insert a new paragraph, so that the new 6.3.4.2 (d) would read as follows:
 - (d) For packagings intended to contain waste, the maximum gross mass in kilograms; this may be omitted when each primary receptacle has been tested with water or water/antifreeze to not less than 98% of its capacity;
- (b) The remaining entries of the list in 6.3.4.2 would change from (d) – (g) to (e) – (h) respectively.
- (c) In subsection 6.3.4.3, *delete* 6.3.4.2 (a) to (g); *add* 6.3.4.2 (a) to (h);
- (d) Subsection 6.3.4.4 including a new example of marking would read as follows:

6.3.4.4 Examples of marking



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



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

- (e) 6.3.5.1.6 g) would have the following amendment: "In addition to the marks prescribed in 6.3.4.2 (a) to ~~(f)(g)~~, packagings shall be marked in accordance with 6.3.4.2 ~~(e)(h)~~."