
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

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Item 3 of the provisional agenda

Listing, classification and packing

Comments on document ST/SG/AC.10/C.3/2017/25 Classification and packaging for infectious waste of Category A

Transmitted by the expert from Switzerland

Introduction

1. Under para. 9 of document ST/SG/AC.10/C.3/2017/25 it is said that the new entry shall not be used for waste from bio-research or other laboratory settings or when transporting liquid wastes. Even if the exclusion of liquid waste containing Category A infectious substances is implicit because only solid waste is mentioned in P6XX and LP6XX, it is however not explicitly mentioned in the text of 2.6.3.5.1 (a).

2. The first sentence in 2.6.3.5.1 (a) specifies that “Medical or clinical waste containing Category A infectious substances shall be assigned to UN 2814, UN 2900 or UN 35XX as appropriate.”. The term “Medical or clinical waste” does not distinguish whether the waste is liquid or is derived from bio-research activities. In principle liquid waste containing Category A infectious substances could be assigned to any of the three entries UN 2814, 2900 or UN 35XX. The second sentence in 2.6.3.5.1 (a) “Solid medical or clinical waste containing Category A infectious substances generated from the medical treatment of humans or veterinary treatment of animals may be assigned to UN 35XX” is not a prescription but only a permission to assign solid medical or clinical waste containing Category A infectious substances to UN 35XX. Its aim is to forbid the assignment of liquid waste to UN 35XX. This is however not achieved as it doesn’t exclude explicitly the assignment of liquid waste to UN 35XX. Waste of infectious substances of Category A from bio-research, however, can only be transported according to UN 2814 or 2900 because the last sentence in 2.6.3.5.1 (a) excludes the assignment to UN 35XX for such kind of waste.

3. Moreover, the users of the regulation often assign a good to an UN entry based on the name appearing in the Dangerous Goods List. The name “MEDICAL WASTE, CATEGORY A, AFFECTING HUMANS or MEDICAL WASTE, CATEGORY A, AFFECTING ANIMALS, only“ does not either exclude liquids. It is less than sure that the users will read the packing instruction P6XX or LP6XX where the use of the packaging is limited to solids.

4. We believe it would improve the usability if the exclusion of this entry for liquids would be explicitly expressed. This could be achieved by changing the last sentence in 2.6.3.5.1 (a) and by adding the word “,solid” directly in the name of UN 35XX.

Proposal

5. Amend 2.6.3.5.1 to read as follows (new text **underlined in bold**):

2.6.3.5.1 Medical or clinical waste containing:

(a) Category A infectious substances shall be assigned to UN 2814, UN 2900 or UN 35XX as appropriate. ~~Solid medical or clinical waste containing Category A infectious substances generated from the medical treatment of humans or veterinary treatment of animals may be assigned to UN 35XX.~~ The UN 35XX entry **may shall** not be used for waste **derived from bio-research activities or for liquid waste.**

(b) Category B **infectious substances** shall be assigned to UN 3291.

Amend Table A of Chapter 3.2 as follows:

<i>UN No.</i>	<i>Name and description</i>
(1)	(2)
-	3.1.2
35XX	MEDICAL WASTE, CATEGORY A, AFFECTING HUMANS, <u>solid</u> or MEDICAL WASTE, CATEGORY A, AFFECTING ANIMALS only, <u>solid</u>

6. The change in the heading of Chapter 6.3 should have consequences in the text of 6.3.1.1. We should then either introduce the limitation to the two UN-Numbers 2814 and 2900 in the sentence of 6.3.1.1, or we shouldn't mention the reference to UN 2814 and 2900 in the heading of Chapter 6.3; or we might delete the text in 6.3.1.1.

7. We wonder why the entries for the waste containing Category A and B infectious substances should not refer to the same kind of waste. UN 3291 refers to "CLINICAL WASTE, UNSPECIFIED, N.O.S. or (BIO) MEDICAL WASTE, N.O.S. or REGULATED MEDICAL WASTE, N.O.S.". Instead of that, UN 35XX does not make any reference to "clinical waste". This although the second sentence mentioned before in 2.6.3.5.1 (a) also refers to clinical waste.

8. The Name in the French version could probably be shortened as in the English version to read "DÉCHETS MÉDICAUX, CATÉGORIE A, INFECTIEUX POUR L'HOMME, solides ou DÉCHETS MÉDICAUX, CATÉGORIE A, INFECTIEUX POUR LES ANIMAUX uniquement, solides ». If this is not retained, it should contain the words « DE LA CATÉGORIE A » after « ANIMAUX »:

"DÉCHETS MÉDICAUX DE MATIÈRES INFECTIEUSES POUR LES ANIMAUX **DE LA CATÉGORIE A**, uniquement» ;

9. As a consequence of the new UN 35XX entry, we should probably also introduce the term ", CATEGORY B," in the entry UN 3291 for all languages.