

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

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Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: packagings

Proposal to align the use of packagings for UN 3549 with those of other category A dangerous goods

Transmitted by the expert from Switzerland

Summary

Executive summary: Packagings for medical waste of Category A (UN 3549) should be subject to the same requirements as those for substances of UN 2814 and 2900. Furthermore, it should be possible to use plastic packagings for UN 3549 for more than 5 years, as for packagings for other Category A infectious substances of UN 2814 and 2900.

Action to be taken: Amend 4.1.8 and P622

Introduction

1. Unlike the provisions for other infectious substances of category A (UN 2814 and 2900), the provisions for medical waste of category A of UN 3549 (SP 395, P622, LP622) do not refer to 4.1.8. As a consequence, contrary to UN 2814 and 2900 in 4.1.8.2, for medical waste the period of use permitted for plastics drums and jerricans is limited according to 4.1.1.15 and the provisions for reuse of the empty packaging of 4.1.8.4 are not applying. In the Model Regulations these provisions are provided for in 4.1.8 and contrary to P620, for UN 2814 and 2900 there is no cross reference to 4.1.8 foreseen in P622 for medical waste of UN 3549.

2. There are some arguments which would justify to apply for UN 3549 the same rules as for UN 2814 and 2900:

Regarding 4.1.8.2

3. Because 4.1.1.15 is not applicable to UN 2814 and 2900, the possibility to extend the period of use of plastic packaging beyond what is foreseen in 4.1.1.15 (5 years) exists according to the list of applicable provision mentioned in 4.1.8.2. This means that only for these two entries the use of plastic packaging above the limits of use in 4.1.1.15 is allowed. For UN 3549, because the heading of 4.1.8 does not mention this entry, the texts don't allow to use plastic packaging above the period specified in 4.1.1.15. Hospitals must however have these packaging urgently available when a patient appears with a disease of this type, so that

these packaging must exist in the hospital stock. However, as this type of disease is relatively rare, it is likely that packagings will not be used regularly and will remain in hospital stocks for a long time without being used. This is already the case in our country. The 5-year limit only applicable to plastic packaging for medical waste of Category A is not justified. This limit of use is maybe justified for packagings which have been used with different contents or filled with dangerous goods under ambient conditions likely to influence the performances of the packaging. As in case of packagings for UN Nos 2814 and 2900, this should not be the case for new packagings stored in hospitals, awaiting the arrival of patients with diseases of category A or for packagings dedicated to the carriage of UN No. 3549. The outer packagings are not directly in contact with the products and the solid infectious substances are unlikely to be so aggressive that they could change the structure of the packagings at all.

4. One could argue that only packaging agreed according to chapter 6.3 (P620) subject to stricter tests (9 m drop test), that are more expensive and whose code for designating types display the marking “class 6.2”, are allowed to be used after the five-year period. Altogether, this means that these packagings have a dedicated use for category A infectious substances. As a matter of fact, this is not the case with the packagings for UN 3459 in the new P622. It is therefore conceivable that they are intended first for other products and then for the transport waste of UN 3549. In fact it is true that reuse, whether for other dangerous goods or only for UN 3549, is also not excluded for outer packagings listed in P622 and even if the test foreseen in chapter 6.3, particularly the drop test of 9 m is stricter than the drop text of 1,8 m for PG I packagings for UN 3549, we wonder if this 9 m drop test applying to UN 2814 and 2900 is the explanation justifying to exceed 5 years. We believe instead that it is more the type of products transported, that is infectious materials having no influence on the resistance of the packaging in the long term, which determines the possibility to extend their use after 5 years as it is actually the case for UN Nos. 2814 and 2900.

5. It seems then that the same criteria should apply for UN 3549. This means that for plastics drums and jerricans, in order to limit their duration of use, only the kind of product carried during the 5 years period is relevant. If it is guaranteed that P622 plastic packaging are only used for infectious materials, it could be considered to give them the same duration of use as for UN Nos 2814 and 2900 of more than 5 years without the approval on a case-by-case basis of the authority as provided for on 4.1.1.15. In principle, the plastic packagings could have the same use as those for UN Nos 2814 and 2900.

6. A further argument in favour of the use of plastics drums and jerricans after 5 years is that the limitation of 5 years does not exist for plastic large packagings conforming to LP622 used for UN 3549. The reason is probably because large packagings are not in contact with the products as is also the case of plastics drums and jerricans used as outer packagings according to P622.

Regarding 4.1.8.4

7. We wonder if the intention was to forbid the reuse of packagings. Even if such a possibility is not possible at every disposal plant, there is no real reason to forbid it. During the development of the texts for the new entry UN 3549 by the Sub-Committee, the possibility of reuse had been suggested by one of the participants but has not been maintained in the text in the final version presented during the 51st session (July 2017). There is however nothing intended to prohibit the reuse of packaging conforming to P622.

8. Apart from the issue of information about the content in 4.1.8.3, the other provisions of 4.1.8 seem to be appropriate also for wastes of UN 3549.

9. We wonder if the intention was not to allow the reuse of packagings. Even if such a possibility is not possible at every disposal plant, there is no real reason to forbid it.

10. Another relevant question is the possibility to extent the period of use of plastic packagings beyond what is foreseen in 4.1.1.15 (5 years). According to the list of applicable

provisions in 4.1.8.2, 4.1.1.15 is not applicable to UN 2814 and 2900. This means that only for these two entries the use of plastic packagings above the limits of use in 4.1.1.15 is allowed. For UN 3549 the texts don't allow to use plastic packagings above the period specified in 4.1.1.15.

11. There are some arguments which would justify to apply for UN 3549 the same rule of 4.1.8.4 as for UN 2814 and 2900: hospitals must have these packaging urgently available when a patient appears with a disease of this type, so that these packagings must exist in the hospital stock. However, as this type of disease is relatively rare, it is likely that packagings will not be used regularly and will remain in hospital stocks for a long time without being used. A 5-year limit only for packagings for medical waste of Category A is not justified. This limit of use is maybe justified for packagings which have been used with different contents or filled with dangerous goods under ambient conditions likely to influence the performances of the packaging. This should not be the case for new packagings stored in hospitals, awaiting the arrival of patients with diseases of category A or for packagings dedicated to the carriage of UN No. 3549. The outer packagings are not directly in contact with the products and the solid infectious substances are unlikely to be so aggressive that they could change the structure of the packagings at all.

12. Only packagings agreed according to Chapter 6.3 (P620) that are subjected to stricter tests (9 m drop test), that are more expensive and whose code for designating types display the marking "class 6.2" are allowed to be used after the five-year period. Altogether, this means that these packagings have a dedicated use for category A infectious substances. It is in fact unlikely, although not excluded, that these expensive packagings will be used for carriage other than for the transport of Category A infectious materials. This is however not the case with the packaging for UN 3459 in the new P622. It is therefore conceivable that they are intended first for other products and then for the transport of wastes of UN 3549. Reuse, whether for other products or for UN 3549, is also not excluded.

13. In order to achieve the purpose for plastics drums and jerricans for UN 3549 to follow the same rules as the packagings for UN 2814 and 2900 the heading of 4.1.8 should be changed.

14. We do believe, however, that plastics drums and jerricans for UN 3549 should be allowed to follow the same rules as the packagings for UN 2814 and 2900. As it is already the case in packing instruction P621 for wastes of infectious substances of category B, it is proposed to add the exclusion of 4.1.1.15 for them, under the condition of dedicated use to substances of class 6.2. This should guarantee a safe transport event if the new packaging has exceeded the 5-year period.

Proposal

15. Amend 4.1.8 as follows (added text underlined in bold, deleted text is strikethrough):

“4.1.8 Special packing provisions for infectious substances of Category A (Division 6.2, UN Nos. ~~2814, and UN 2900 and 3549~~)

4.1.8.1 Consignors of infectious substances shall ensure that packages are prepared in such a manner that they arrive at their destination in good condition and present no hazard to persons or animals during transport.

4.1.8.2 The definitions in 1.2.1 and the general packing provisions of 4.1.1.1 to 4.1.1.14, except 4.1.1.10 to 4.1.1.12, apply to infectious substances packages **for UN 2814 and 2900 and containing packaging dedicated only to the transport of UN 3549**. However, liquids shall only be filled into packagings which have an appropriate resistance to the internal pressure that may develop under normal conditions of transport

4.1.8.3 **For UN 2814 and UN 2900** An itemized list of contents shall be enclosed between the secondary packaging and the outer packaging. When the infectious substances to be transported are unknown, but suspected of meeting the criteria for inclusion in category A, the words “suspected category A infectious substance” shall be shown, in parentheses, following the proper shipping name on the document inside the outer packaging.

4.1.8.4 Before an empty packaging is returned to the consignor, or sent elsewhere, it shall be disinfected or sterilized to nullify any hazard and any label or mark indicating that it had contained an infectious substance shall be removed or obliterated.

4.1.8.5 Provided an equivalent level of performance is maintained, the following variations in the primary receptacles placed within a secondary packaging are allowed without further testing of the completed package.”

16. 4.1.4.1, P622 Amend the second sentence to read as follows (the added text is shown in **bold**):

“The following packagings are authorized provided the general provisions of **4.1.1, and 4.1.3 and the special packing provisions of 4.1.8** are met:”.

Add a new paragraph 8 under “Additional requirements” to read as follows:

“8. The provisions of 4.1.1.15 do not apply for plastics drums and jerricans used as outer packaging dedicated only to the transport of UN No. 3549.”

Alternatively this could be introduced in a special provision in Chapter 3.3 to read as follows:

“SPXYZ The provisions of 4.1.1.15 do not apply for plastics drums and jerricans used as outer packaging dedicated only to the transport of UN No. 3549.”

17. Consequential amendments:

4.1.1 In the NOTE replace “*Division 6.2, UN 2814 and UN 2900*” by “***Division 6.2, UN 2814, UN 2900 and UN 3549***”.

Justification

18. Even if it could seem redundant, the change proposed to 4.1.8.2 excludes from the possibility to apply the exemptions to some provisions of 4.1.1 (4.1.1.15 and 4.1.1.10 to 4.1.1.12) those packages having been used for other kind of dangerous goods, particularly in the case of UN 3459. The possibility to use plastic drums and jerricans above 5 years should be limited to those packagings which were only used for medical waste of UN 3549.

19. As explained, we do believe that for UN 3549 the information required in 4.1.8.3 is not necessary so 4.1.8.3 should apply only to UN 1814 and 2900.