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Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Bern, 17–21 March 2014
Item 5 (b) of the provisional agenda
Proposals for amendments to RID/ADR/ADN: New proposals

Approval of packagings for the carriage of infectious substances

Transmitted by the Government of Switzerland[1,2]

Summary

Executive summary:	It is not possible to tell from the texts under 4.1.8 whether packagings for the carriage of infectious substances must be approved.
Action to be taken:	Amend the text of 4.1.8.2 and 4.1.8.6.

Introduction

1. Switzerland would like to know whether the various categories of infectious substances need to be transported in approved packagings.

2. In Switzerland's view, Category A infectious substances should be transported in approved packagings, while Category B substances do not need to be transported in

[1] In accordance with the programme of work of the Inland Transport Committee for 2012–2016 (ECE/TRANS/224, para. 94, ECE/TRANS/2012/12, programme activity 02.7 (A1c)).

[2] Circulated by the Intergovernmental Organisation for the International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2014/28.

approved packagings. This interpretation derives from the UN Model Regulations: for UN Nos. 2814 and 2900 (Category A), packing instruction P620 is applied and for UN No. 3373 (Category B), packing instruction P650 is applied. Unlike P620, P650 does not require the use of approved packagings.

3. As a result, RID/ADR 4.1.8.2 and 4.1.8.6 could be confusing. 4.1.8.6 states that paragraph 4.1.8.2 applies only to Category A infectious substances. 4.1.8.2 states that 4.1.1.3 (requirement to use packagings conforming to a design type) does not apply to packages of infectious substances. That could be interpreted to mean that it is not necessary, for Category A substances only, to use packagings conforming to a design type, which is the opposite of the intention expressed above.

4. To make things clear, the exemption from the provisions of 4.1.1.3 that appears in 4.1.8.2 should be placed elsewhere and should refer exclusively to Category B substances. For example, the reference to 4.1.1.3 in 4.1.8.2 could be removed and the text of 4.1.8.6 could be amended as follows:

Proposal

In 4.1.8.2, delete “, 4.1.1.3”.

Amend 4.1.8.6 as follows:

“4.1.8.6 Paragraphs 4.1.8.1 to 4.1.8.5 only apply to infectious substances of Category A (UN Nos. 2814 and 2900).

For UN No. 3373 BIOLOGICAL SUBSTANCE, CATEGORY B (see packing instruction P650 of 4.1.4.1), and UN No. 3291 CLINICAL WASTE, UNSPECIFIED, N.O.S. or (BIO) MEDICAL WASTE, N.O.S. or REGULATED MEDICAL WASTE, N.O.S., the following provisions do not apply:

- Paragraph 4.1.1.3
- Paragraphs 4.1.8.1 to 4.1.8.5, except 4.1.8.2”