COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS (Twenty-first session, Geneva, 4 - 12 December 2000, agenda item 2(b))

# WORK OF THE SUB-COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

#### **Requirements for Diagnostic Specimens**

### **Transmitted by the expert from the United States**

#### Introduction

- 1. While supporting the substantive aspects of revised provisions for diagnostic specimens as set out in ST/SG/AC.10/2000/7, the expert from the United States questions the appropriateness of the manner in which the new requirements are presented.
- 2. If adopted the new requirements will for the first time assign a UN number to diagnostic specimens. They will also assign diagnostic specimens to Division 6.2 even though the vast majority of diagnostic specimens that are transported do not pose an infectious substance risk.
- 3. Even though a UN number and Division 6.2 classification would be assigned, they will have no relevance in fulfilling the requirements for diagnostic specimens as a provision in the new packing instruction 650 states:

"Provided that diagnostic specimens are packed in accordance with this packing instruction, no other requirements of these Model Regulations shall apply."

Based on this provision, the UN number for diagnostic specimens and the assigned 6.2 classification will not be required to appear on transport documents or in the package marking.

- 4. While it is appreciated that the assignment of a UN number and the Division 6.2 to diagnostic specimens was done so that the applicable requirements could be easily located, assignment of a UN number to an item that is only minimally subject to the dangerous goods regulations is precedent setting and is confusing. It should also be noted that the route for locating Diagnostic Specimen requirements will normally be through the index since the UN number will usually be unknown to the user of the Model Regulations.
- 5. In the ICAO Technical Instructions (upon which the diagnostic specimen requirements being considered for inclusion in the Model Regulation are largely based) and other regulations there are

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a number of items which are subject to minimal requirements without being assigned a UN number or a class or division. Perhaps the most common of these are batteries which must be protected from short circuiting so as to avoid the development of an unsafe amount of heat in transport. Like batteries, diagnostics specimens are also listed in the ICAO Technical Instructions in this manner.

6. It is recommended that diagnostic specimens not be listed in the Dangerous Goods List. Instead it is recommended that diagnostic specimens be included in the index with a reference to the new paragraph 2.6.3.1.3.

### **Proposal**

7. It is proposed that the following entry be added to the index:

Diagnostic Specimens See 2.6.3.1.3

8. It is proposed that paragraph 2.6.3.1.3 in document ST/SG/AC.10/2000/7 be revised to read:

"Diagnostic specimens are any human or animal material, including, but not limited to, excreta, secreta, blood and its components, tissue and tissue fluids being transported for diagnostic or investigation purposes, but excluding live infected animals.

Diagnostic specimens shall be <u>transported in accordance with packing instruction 650</u> assigned to UN 3373 unless the source patient or animal has or may have a serious human or animal disease which can be readily transmitted from one individual to another, directly or indirectly, and for which effective treatment and preventive measures are not usually available, in which case they shall be assigned to UN 2814 or UN 2900.

9. It is recommended that the proposed entry for UN 3373 in the Dangerous Goods List in ST/SG/AC.10/2000/7 not be adopted and that the introduction of packing instruction 650 in ST/SG/AC.10/2000/7 be amended consequentially.