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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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MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Note by the secretariat

The secretariat reproduces hereafter a support of IUMS to the WFCC proposal.

INTERNATIONAL UNION OF MICROBIOLOGICAL SOCIETIES

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Mascheroder Weg 1b,
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Dear Brian,
As you know, IUMS represents the world's microbiological community of some 300,000 microbiologists at international forums and committees, particularly through the International Council of Science, but also through NGOs such as WHO.

Research facilities in applied and basic research over the world often have to exchange living biological material in order to fulfil different aims: microorganisms are involved in scientific cooperation, test assays or reference experiments for quality control procedures. In most cases, characterised pure and defined authentic cultures have to be used for such laboratory work as this is only possible with well-characterised cultures. In reality, administrational expenditure and therefore, unacceptably extreme costs and furthermore even the difficulty in finding a courier service willing to transport infectious substances (Risk Group 2 cultures) have made global exchange difficult if not even impossible in some countries (e.g. Northern Europe).

In view of the fact that the UN Model Regulations have foreseen a sensible deregulation in that diagnostic specimens for diagnostic or clinical purposes are not classified according to their Risk Groups but according to the new Categories A or B, SGM suggests to verify the same conditions for such cultures clearly assigned to the lowest Risk Group among the infectious substances, namely Risk Group 2. This Risk Group *per definitionem* only contains microorganisms bearing a low to limited risk, effective treatment and prophylaxis is available. This definition was designed for work with the organisms in the laboratory, not for transport.

IUMS believes that such cultures assigned to Risk Group 2 do not bear a risk higher than a diagnostic/clinical sample containing infectious substances of the same or an even higher Risk Group namely RG 3. The definition of the new Category A excludes the Risk Group 2 for shipping purposes and vice versa. Being properly packed under IATA Packing Instruction 650, a culture of Risk Group 2 in transit does not pose a risk of an infection as 1) a triple containment system physically protects the environment from the contents and 2) a RG 2 organism would need a preculturing step using a suitable medium and the correct temperature. Growth during transport is hardly possible for most of the organisms, also because of the need of the right atmosphere (oxygen). In contrast, diagnostic samples resemble a „ready-to-use- medium" as they have been taken from patients, at least to some extent.

We therefore propose that the definition of a culture according to the UN Model Regulations, 2.6.3.1.3, shall be independent on the purpose of the generation of the culture and of the shipping purpose (whether the culture is sent for diagnostic or for other laboratory procedures). Furthermore, a culture of a microorganism allocated to Risk Group 2, shall be transported as Category B, UN 3373 (UN Model Regulations 2.6.3.2.2.2).

We would be very happy if you could represent IUMS and we give our full support to the WFCC initiative for changing regulations relating to the shipment of pathogens (dangerous goods).

Yours sincerely,

John S Mackenzie,
Secretary General