

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

11 September 2019

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

Geneva, 17–27 September 2019

Item 4 of the provisional agenda:

**Harmonisation with the UN Recommendations
on the Transport of Dangerous Goods**

Proposal to amend document ECE/TRANS/WP.15/AC.1/2019/22/Add.1: provisions on UN 3549

Transmitted by the Government of Switzerland

Summary

Executive summary: Packagings for medical waste of Category A (UN 3549) should be subject to the same requirements as those in the UN Model Regulations: they should not be reused. 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.

Action to be taken: Amend 4.1.8.6, P622 and LP622 in document ECE/TRANS/WP.15/AC.1/2019/22/Add.1.

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 (DS 395, P622, LP622) do not allow the reuse of packagings. In the Model Regulations these provisions are provided for at 4.1.8 and a cross-reference to 4.1.8 is made in packaging instructions P620. This is not the case in the new P622 and LP622.

2. During the development of the texts for the new entry UN 3549 by the Sub-Committee of experts on dangerous goods, the possibility of reuse had been suggested by one of the participants but had not been maintained in the final version presented during the July 2017 session. This situation is reflected in the Model Regulations by the heading of 4.1.8 "Special packing provisions for the infectious substances of Category A (Division 6.2, UN 2814 and UN 2900)".

3. In the RID-ADR-ADN this heading is otherwise formulated "Special packing provisions for infectious substances (Class 6.2)", so that the scope of 4.1.8 by the introduction without further indication of the entry UN 3549 is different in the RID-ADR-ADN from that in the Model Regulations.

4. Given the provisions in 4.1.8, it seems clear that most of the requirements are not relevant to the carriage of waste. Furthermore, the introduction of the possibility to reuse the packaging implies the existence at the incineration plant of special equipment and highly qualified personnel who guarantee the sterilization of the packaging. Such an eventuality is

far from realistic, therefore the Model Regulations do not permit the reuse of packaging for medical waste of category A.

5. It seems that the scope of 4.1.8 of the RID-ADR-ADN regarding UN 3549 should not go beyond what is provided for in the Model Regulations. For that reason Switzerland proposes to change 4.1.8.6 (proposal 1).

6. Despite this finding, there is still an important point which needs to be clarified. It concerns the possibility of extending the period of use of plastic packagings beyond what is foreseen in 4.1.1.15 (5 years). 4.1.8.2 authorizes the use of plastic packagings beyond the five year limit of 4.1.1.15 for infectious substances of UN 2814 and 2900. There is no reason not to apply this principle also in the case of medical waste of category A of UN 3549. Switzerland believes that hospitals must have these packagings 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. For this reason, it is proposed to add the exclusion of 4.1.1.15 in packaging instructions P622 and LP 622, as it is done in packaging instruction P621 (proposal 2).

7. In this regard it is noted that this possibility does not currently exist in the Model Regulations and Switzerland will propose to correct this point also at the level of the Sub-Committee. However, Switzerland prefers not to wait for the decision by the Sub-Committee and introduces it already in RID-ADR-ADN 2021 together with the other new provisions for UN 3549.

Proposal 1

8. 4.1.8.6 Amend the text to read as follows (the added text is shown in bold):

“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). They do not apply to UN No. 3373 BIOLOGICAL SUBSTANCE, CATEGORY B (see packing instruction P650 of 4.1.4.1), nor to UN No. 3291 CLINICAL WASTE, UNSPECIFIED, N.O.S. or (BIO) MEDICAL WASTE, N.O.S. or REGULATED MEDICAL WASTE, N.O.S., **nor to UN No. 3549 MEDICAL WASTE, CATEGORY A, AFFECTING HUMANS or MEDICAL WASTE, CATEGORY A, AFFECTING ANIMALS**”

Proposal 2

9. 4.1.4.1, P622 and LP 622 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 except 4.1.1.15** and **4.1.3** are met”
