

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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Item 3 of the provisional agenda

Listing, classification and packing

Used medical devices containing or packed with lithium batteries

Transmitted by the Council on the Safe Transportation of Hazardous Articles (COSTHA), Dangerous Goods Trainers Association (DGTA), and Medical Device Transport Council (MDTC)

1. COSTHA has received input from several members on the proposals contained within document ST/SG/AC.10.C.3/2024/51 regarding lithium batteries within medical devices. The intention of the proposal was to address a gap in the proper hazard identification when used medical devices eligible for exemption under 2.6.3.2.3.9 contain lithium batteries.
2. Based on the feedback, this paper contains revised proposals to address the issue.

Proposal

3. COSTHA proposes the addition of the underlined text to 2.6.3.2.9 in order to include provisions for lithium batteries intended for use within medical devices which are being transported for disinfection, cleaning, sterilization, repair, or equipment evaluation:

“2.6.3.2.3.9 Except for:

- (a) medical waste (UN 3291);
- (b) medical devices or equipment contaminated with or containing infectious substances in Category A (UN 2814 or UN 2900); and
- (c) medical devices or equipment contaminated with or containing other dangerous goods that meet the definition of another hazard class except for lithium batteries (UN 3091 & UN 3481);
- (d) medical devices or equipment potentially contaminated with or containing infectious substances which are being transported for disinfection, cleaning, sterilization, repair, or equipment evaluation are not subject to the provisions of these Regulations if packed in packagings designed and constructed in such a way that, under normal conditions of transport, they cannot break, be punctured or leak their contents. Packagings shall be designed to meet the construction requirements listed in 6.1.4 or 6.6.5.

These packagings shall meet the general packing requirements of 4.1.1.1 and 4.1.1.2 and be capable of retaining the medical devices and equipment when dropped from a height of 1.2 m. For air transport, additional requirements may apply.

The packagings shall be marked “USED MEDICAL DEVICE” or “USED MEDICAL EQUIPMENT”. When using overpacks, these shall be marked in the same way, except when the inscription remains visible.

Used medical devices that contain or are packed with a lithium battery as described in 2.6.3.2.9(c) shall also comply with all applicable provisions of UN 3481 LITHIUM ION BATTERIES CONTAINED IN EQUIPMENT or LITHIUM ION BATTERIES PACKED

WITH EQUIPMENT, or UN 3091 LITHIUM METAL BATTERIES CONTAINED IN
EQUIPMENT or LITHIUM METAL BATTERIES PACKED WITH EQUIPMENT.
