



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

Sixty-fifth session

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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)

I. Introduction

1. At the sixty-fourth session of the Sub-Committee, COSTHA submitted document ST/SG/AC.10/C.3/2024/51 and informal document INF.19 with the intention of addressing 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. The Sub-Committee was supportive of the effort, but suggested modification.

II. Proposal

3. COSTHA proposes the addition of the underlined text to 2.6.3.2.9 to include provisions for lithium batteries and sodium ion 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 unless the other hazard class is due to batteries contained in or packed with equipment (i.e. UN 3091, UN 3481, UN 3552), 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 lithium batteries or sodium ion batteries as described in 2.6.3.2.3.9 (c) shall comply with all applicable provisions of:

- UN 3481 LITHIUM ION BATTERIES CONTAINED IN EQUIPMENT or LITHIUM ION BATTERIES PACKED WITH EQUIPMENT.
- UN 3091 LITHIUM METAL BATTERIES CONTAINED IN EQUIPMENT or LITHIUM METAL BATTERIES PACKED WITH EQUIPMENT.
- UN 3552 SODIUM ION BATTERIES CONTAINED IN EQUIPMENT or UN 3552 SODIUM ION BATTERIES PACKED WITH EQUIPMENT.

as appropriate."

4. Alternately, the last paragraph above may be written similar to the language contained in 5.5.4.2 for dangerous goods contained in equipment in use:

"...

When used medical devices contain or are packed with lithium batteries or a sodium ion batteries as described in 2.6.3.2.3.9 (c), the relevant entry of the Dangerous Goods List in Chapter 3.2 shall be used and all applicable provisions of these Regulations shall apply."
