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**COMMITTEE OF EXPERTS ON THE TRANSPORT
OF DANGEROUS GOODS**

**(Twenty-first session,
4-13 December 2000,
agenda item 2 (c))**

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

New proposals

Editorial amendments to Chapter 4.1

Transmitted by the expert from the United Kingdom

During a review of the provisions concerning large packagings for clinical waste and as a result of the Sub-Committee decisions during its eighteenth session, a number of editorial problems in Chapter 4.1 have been identified.

4.1.1 Title

This currently reads:

‘General Provisions for the packing of dangerous goods, other than goods of Classes 2 or 7 or Division 6.2, in packagings, including IBCs and large packagings’

This is followed by a NOTE, which reads:

‘NOTE: Some of these general provisions may apply to packing of goods of Class2, Division 6.2 and Class 7.....’

The text in the title underlined contradicts the text in the first sentence of the note.

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Proposal

The expert from the United Kingdom proposes that the underlined text be removed from the title but remains in the Note.

4.1.8. Special packing provisions for infectious substances (Division 6.2)

A.

As currently worded in 4.1.8.2 packagings for substances in Division 6.2 are excluded from testing requirements (4.1.1.3) and such packagings do not have to comply with 4.1.1.9 – 4.1.1.12.

4.1.1.3 requires UN testing of packagings. Chapter 6.3 sets down the rules for tests in Division 6.2 but by the exclusion of 4.1.1.3 in 4.1.8.2 they do not appear to have to be carried out.

4.1.1.9 this paragraph requires the filler to make sure that the packaging is suitable for use and it seems logical that this should be applied to any packaging including those of Division 6.2.

4.1.1.10 requires liquid to be filled into packagings that have a resistance to pressure. Many infectious substances and clinical wastes are liquid. Resistance to pressure should surely apply to Division 6.2.

4.1.1.11 Many clinical waste packagings are moved in an empty, uncleaned state and again there seems to be no valid reason to exempt them from this section

4.1.1.12 is not relevant to packagings for substances of Division 6.2.

Proposal

- (i) Delete 4.1.8. 2
- (ii) Amend Packing Instruction P620, which applies to UN 2814 and UN 2900, to read in the third line:

“The following packagings are authorized provided the general provisions of 4.1.1 and 4.1.8 are met.”
- (iii) Amend Packing Instruction P621, which applies to UN 3291 to read in the third line:

“The following packagings are authorized provided the general provisions of 4.1.1, 4.1.3 and 4.1.8 are met.”

B.

The current 4.1.8.3 should not apply to clinical waste packagings since there is currently no requirement for these to have secondary packaging.

Proposal

Amend 4.1.8.3 as follows:

“For UN 2814 and UN 3900 an itemized ... (remainder unchanged)”

C.

Since the Sub-Committee, at its eighteenth session, decided to include all provisions relating to diagnostic specimens (UN 3373) together in Packing Instruction P650, the provisions of 4.1.8 are no longer relevant.

Proposal

Add a new paragraph 4.1.8.4. as follows:

“The provisions of this section do not apply to UN 3373 diagnostic specimens (see P650)”

Summary

If these proposals are adopted the revised 4.1.8. would read as follows:

“4.1.8 Special packing provisions for infectious substances (Division 6.2)”

- 4.1.8.1 Consignors of infectious substances shall ensure that packages are prepared in such a manner that they arrive at their destination in good condition and present no hazard to persons or animals during transport.
- 4.1.8.2 For UN 2814 and UN 2900 an itemized list of contents shall be enclosed between the secondary packaging and the outer packaging.
- 4.1.8.3 Before an empty packaging is returned to the consignor, or sent elsewhere, it shall be thoroughly disinfected or sterilized and any label or marking indicating that it had contained an infectious substance shall be removed or obliterated.
- 4.1.8.4 The provisions of this section do not apply to UN 3373 diagnostic specimens (see P650).”
