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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

Thirtieth session Geneva, 4-12 (a.m.) December 2006 Item 2(a) of the provisional agenda

# PROPOSALS OF AMENDMENTS TO THE RECOMMENDATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Model Regulations on the Transport of Dangerous Goods

Transport of infectious substances – Bulk animal carcasses

Transmitted by the expert from the United Kingdom

#### **BACKGROUND**

1. The Sub-Committee will recall the paper that the expert from the United Kingdom put forward at the July 2006 Sub-Committee on the bulk transport of infected animal carcasses. The United Kingdom drew the attention of the Sub-Committee to the regulations for the bulk transport of wastes and animal carcasses in Division 6.2 which were adopted by the Sub-Committee over the last two biennia for the 13th and 14th revised editions of the UN Model Regulations. The expert from the United Kingdom noted that the secretariat had pointed out that regulations currently do not appear to take account of all possible aspects of such transport in any detail. The United Kingdom stated that this issue was all the more pertinent with the need to address disposal of carcasses infected with the various avian flu virus, some of which could be classified as Category A, some in Category B. The Sub-Committee will recall the following problems were outlined

## 2. For example:

- (a) Animal carcasses infected with Category B pathogens. At the moment only animal carcasses infected by Category A substances have bulk transport provisions. Arguably, UN 3373 should not be used; its proper shipping name is Biological Substance Category B and its intention is to cover specimens for analysis etc. whether human or animal. The packaging provisions are unsuitable for the transport of carcasses and no transport is allowed in bulk;
- (b) UN 2814 in bulk. There are no provisions for the transport of this in bulk in the Dangerous Goods List in Chapter 3.2.
- 3. In the July paper the expert from the United Kingdom also sought to take on board the comments expressed in the report of the <u>Ad-Hoc</u> UN/RID/ADR harmonisation working group, TRANS/WP.15/AC.1/2005/42, paragraph 15-19, that apart from animal carcasses UN 2814 should not be carried in bulk. At that time the expert from the United Kingdom acknowledged the concerns expressed in the report namely; bulk transport should not apply to, for example, substances of Category A taken to a laboratory for analysis. He agreed that there should be a separate entry but <u>not</u> in UN 2814 to cover animal carcasses, body parts etc.
- 4. The Sub Committee will recall that the expert from the United Kingdom made a number of proposals to cover this omission in the Regulations. These included adding a new UN number for the assignment of bulk animal carcasses or animal foodstuffs infected with pathogens of Category B; a new entry to cover infectious substances affecting humans, where these are animal carcasses infected with Category A pathogens; and the deletion of the tank codes T1 and TP1 from UN 3373 and their insertion in columns 10 and 11 against the new UN number for Category B instead.
- 5. During the debate that followed the expert from the United Kingdom undertook to produce a revised paper taking into account the comments received at the meeting as well as in writing afterwards. The expert from the United Kingdom thanks the experts from Belgium, Germany-Canada, United States and the observer from Switzerland for providing written comments. Below are the revised proposals which he feels can now be adopted by the Sub-Committee. Each group of proposals deals with specific parts of the Model Regulations where provisions for infectious substances are made. They should, however, be considered together as a complete package.

#### Proposal 1

- Replace 2.6.3.2.1 with the following:
  - "Infectious substances shall be classified in Division 6.2 and assigned to UN2814, UN2900, UN3291, UN3373, UNXXXX, UNYYYY or UNZZZZ, as appropriate."
- Amend the relevant parts of 2.6.3.2.2.1 to read:

- "(a) Infectious substances...in humans or both humans and animals shall be assigned to UN2814 or UNXXXX. Infectious...only in animals shall be assigned to UN2900 or UNYYYY.
- (b) Assignment to UN2814 or UN2900 (or UNXXXX or UNYYYY) shall be based....

Note 1: The proper shipping name for UN 2814 is INFECTIOUS SUBSTANCE, AFFECTING HUMANS. The proper shipping name for UN 2900 IS INFECTIOUS SUBSTANCE, AFFECTING ANIMALS only. If animal carcasses, body parts, fluids or foodstuffs containing Category A pathogens are waste goods and are to be transported in bulk see 2.6.3.2.2.3"

- Amend the relevant parts of 2.6.3.2.2.2 to read:

".....Infectious substances in Category B shall be assigned to UN3373 or UNZZZZ.

Note: The proper shipping name for UN 3373 is BIOLOGICAL SUBSTANCE, CATEGORY B. If animal carcasses, body parts, fluids or foodstuffs containing Category B pathogens are to be transported in bulk see 2.6.3.2.2.3."

- Add a new 2.6.3.2.2.3:

"Assignment to the appropriate UN Number is determined by the amount to be transported as well as the nature of the substance. UNXXXX and UNYYYY are entries for bulk transport of Category A substances affecting humans and affecting animals only, respectively. UNXXXX and UNYYYY are applicable to any amount of Category A substance to be carried in bulk. UNZZZZ is applicable to Category B substances. It is assigned to any amount of Category B substance to be carried in bulk, or where the substance is in packagings containing more than 4kg each which do not contain body parts, organs or whole bodies. It does not apply to Category B clinical waste (see 2.6.3.5).

Animal material means carcasses, body parts, fluids or animal feedstuffs."

- Amend 2.6.3.5.1 as follows:

"Medical or clinical wastes containing Category A infectious substances shall be assigned to UN2814, UN2900, *UNXXXX or UNYYYY* as appropriate...."

- Amend the title of 2.6.3.6 to read "Live infected animals"

## Proposal 2

- Add new entries to the Dangerous Goods List:

UN No.	Name and description	Class or division	Subsi- diary risk	UN packing group	Special provi- sions	Limited quan- tities	Packagings and IBCs		Portable tanks and bulk containers	
		urvision	HSK	group	Sions	titles	Packing instruction	Special Packing provision	Instruc- tions	Special provisions
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(1)	(2)
	ANIMAL MATERIAL IN BULK, containing Category A pathogens affecting humans	6.2			318	None			BK1 BK2	
	ANIMAL MATERIAL IN BULK, containing Category A pathogens affecting animals only	6.2			318	None			BK1 BK2	
ZZZZ	ANIMAL MATERIAL IN BULK, containing Category B pathogens	6.2			318	None			BK 1 BK2 T1	TP1

- A number of consequential amendments would then need to be made to the entries for UN2900 and UN3373:
  - i. Remove BK1 and BK2 from column (10) of UN2900.
  - ii. Remove T1 and TP1 from column (10) of UN3373.
- A consequential amendment would be made to Special Provision SP318:

"For the purposes of documentation the proper shipping name shall be supplemented with the technical name (see 3.1.2.8). Technical names need not be shown on the package (where a package is used). When the infectious substance to be transported in packages is unknown but is suspected of meeting the criteria for inclusion in Category A, and assignment to UN 2814 or UN 2900, the words "suspected category A infectious substance" shall be shown, in parentheses, following the proper shipping name on the transport document but not on the outer packaging.

### Proposal 3

- i. Amend 4.3.2.4.1 to read "Bulk waste goods of Division 6.2 (UN Nos.—2814, 2900, XXXX and YYYY (animal carcasses only)). Replace "2814 and 2900" with "XXXX and YYYY" wherever it occurs.
- ii. Amend 4.3.2.4.2 to read "Bulk waste goods of Division 6.2 (UN No.3291 *and ZZZZ*). Add "and ZZZZ" to "3291" wherever it occurs.

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