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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

Thirty-fourth session
Geneva, 1-9 December 2008
Item 3 of the provisional agenda

PERFORMANCE OF PACKAGINGS, INCLUDING IBCS

Chapter 4.1

Submitted by the expert from France¹

Issue

1. The note to subsection 4.1.1 establishes that for goods of class 6.2 covered by 4.1.8, the general provisions of 4.1.1 apply only as indicated in 4.1.8.2.
2. In reading 4.1.8.2, it should be noted that paragraph 4.1.1.15, which deals with the permitted period of use for plastic drums and jerricans, rigid plastic IBCs and composite IBCs with plastic inner receptacles in the transport of dangerous goods, is not cited as being applicable.
3. In other words, the period of use of packagings covered by 4.1.1.15 is thus unlimited when such packagings are used for the transport of the infectious goods covered by subsection 4.1.8.

¹ In accordance with the programme of work of the Sub-Committee for 2007-2008 approved by the Committee at its third session (refer to ST/SG/AC.10/C.3/60, para. 100 and ST/SG/AC.10/C.3/34, para. 14).

4. In the fourteenth edition of the United Nations Recommendations on the Transport of Dangerous Goods, subsection 4.1.8 was applicable to all infectious goods in class 6.2, including UN No. 3291 (clinical waste, unspecified, n.o.s. or (bio) medical waste, n.o.s or regulated medical waste, n.o.s.). The P621 and IBC620 packing instructions applicable to this UN number made reference to subsection 4.1.8. Consequently, there was no limit to the allowable period of use of the packagings mentioned in 4.1.1.15 that were employed for the transport of UN No. 3291.

5. In the fifteenth edition of the Recommendations, the title of subsection 4.1.8 has been amended to cover only UN Nos. 2814 and 2900. Subsection 4.1.8 thus no longer applies to UN No. 3291. At the same time, the reference to subsection 4.1.8 has been removed from packing instructions P621 and IBC620 (see document ST/SG/AC.10/1/Rev.15/Corr.1, paras. 25 and 26). Consequently the whole of 4.1.1, including 4.1.1.15, is now applicable to packagings used for the transport of UN No. 3291.

6. Thus, on entry into force of the amendments to the modal regulations, including the fifteenth edition of the United Nations Recommendations on the Transport of Dangerous Goods, all packagings cited in 4.1.1.15 over five years old will be excluded from the transport of UN No. 3291, unless the competent authority issues a derogation.

7. The expert from France has no recollection of a detailed discussion on this subject in the Sub-Committee when it revised the heading of subsection 4.1.8, and believes this situation will give rise to numerous difficulties for those involved in the transport chain for UN No. 3291.

Proposal

8. Given that the consequences of the amendment of the title of subsection 4.1.8 are not the result of any specific decision by the Sub-Committee in respect of the application of 4.1.1.15 to UN No. 3291; and that, in France's view, the goods transported under UN No. 3291 are not such as to be liable to affect the plastic packagings used, the expert from France proposes exempting these packagings from the application of 4.1.1.15, as follows (the proposed new text is underlined):

(a) In packing instruction P621, amend the second sentence to read:

“The following packages are authorized provided that the general provisions of 4.1.1, except 4.1.1.15, and 4.1.3, are met:”

(b) In packing instruction IBC620, amend the second sentence to read:

“The following packages are authorized provided that the general provisions of 4.1.1, except 4.1.1.15, and 4.1.3, are met:”

9. The Sub-Committee is requested to consider this proposal and, if necessary, to draw the attention of the modal bodies to its decision as soon as possible. If the Sub-Committee is not in favour of the proposal and is of the opinion that the period of use should be limited to five years, it will be necessary to introduce a transitional period at least.
