

## **DANGEROUS GOODS PANEL (DGP)**

### **NINETEENTH MEETING**

**Montreal, 27 October to 7 November 2003**

#### **Agenda Item 2 Development of recommendations for amendments to the Technical : Instructions for incorporation in the 2005/2006 edition**

### **INFECTIOUS SUBSTANCES IN PI 650**

(Presented by W.A. Schuurman)

#### **1. INTRODUCTION**

1.1 Proposals to transport Infectious Substances under Packing Instruction 650 have caused a great deal of confusion and have given rise to numerous questions throughout the industry. IFALPA has raised the issue both at the UN and at ICAO.

1.2 This paper is not meant to repeat all that has been brought forward previously on this subject by IFALPA, however some highlights are mentioned here:

- C The correct use of Packing Instruction 650 (by non-transport experts) if containing Infectious Substances, cannot be ensured and enforced when there is no requirement for marking, labelling, manifesting and acceptance checks.
- C Contrary to other modes of transport, aircraft cargo compartments and passenger/crew compartments are very close to one another and often share ventilation systems. An information paper will be put forward to illustrate and explain this further.
- C The distinction between Risk Group 4 and 3 is high/low community risk while individual risk is high for both. This compromises the safety of individuals actively or passively involved with air transport of dangerous goods if Risk Group 3 substances are transported under Packing Instruction 650 without additional requirements.
- C The Pilot-in-Command is responsible for the operation of the aircraft, and has final authority as to the disposition of the aircraft while in command. (Annex 2, chapter 2) The safety precautions for which the P-I-C is responsible includes all necessary emergency response information for every aspect of

flight operation being readily available on the flight deck. This, necessarily, includes the NOTOC with its vital Dangerous Goods (DG) emergency response information.

C The safeguard of proper emergency response for both individuals involved and members of the general public, for which the Pilot-in-Command can be held accountable, must be maintained. In order to accomplish this, Infectious Substances for which Emergency Response is required, must be identifiable to all involved, including proper hazard labelling and mentioning on the NOTOC.

C IFALPA strongly believes that inclusion of Risk Group 2 and 3 Infectious Substances without additional requirements in UN3373, is contrary to the philosophy of Safe Transport of Dangerous Goods by Air as laid down in Annex 18 and the Technical Instructions.

Furthermore we believe that the best approach to this should have been the provision of a separate UN Number and a separate Packing Instruction.

1.3 As discussions have now taken place at the Panel during DGP-WG/03 in the ad hoc working group on Infectious Substances, it is therefore felt that the following conclusion can be made:

C As Emergency Response is needed for Infectious Substances shipped under Packing Instruction 650, a clear majority was of the opinion that adequate provisions should be in place.

C This proposal is meant to provide for these adequate provisions in Packing Instruction 650.

## 2. **PROPOSAL 1**

2.1 Delete in Packing Instruction 650 item (9) and insert new item (9) and (10):

(9) Infectious Substances assigned to UN 3373 which are packed and marked in accordance with this packing instruction are subject to other requirements as listed below.

(10) Infectious Substances can only be shipped in Packing Instruction 650 if additional requirements of marking, labelling, handling, manifesting and of provision of information are followed:

- The shipper must identify Infectious Substances, including the technical name on the transport document.
- The proper shipping name shall be marked on the package as 'Diagnostic Specimens containing Infectious Substances.'
- Labelling shall be applied using the Infectious Substance hazard label.
- Handling requirements by the operator shall be provided for, including acceptance procedures, storage and loading, inspection for contamination and provision of information, except for advance arrangements.

If the Panel decides against Proposal 1, Proposal 2 should be considered in order to maintain a basic level of safety for shipment of infectious Substances under UN 3373.

3. **PROPOSAL 2**

3.1 Delete in Packing Instruction 650 item (9) and insert new item (9) and (10):

- (9) Infectious Substances assigned to UN 3373 which are packed and marked in accordance with this packing instruction are subject to other requirements as listed below.
- (10) Infectious Substances can only be shipped in Packing Instruction 650 if additional requirements of manifesting, handling and of provision of information are followed:
  - a) The dangerous goods transport document requirements of 5.4.1 are not applicable provided alternative documentation is supplied containing the following information: UN number, proper shipping name with technical name and net quantity.
  - b) Appropriate handling by the Operator shall be provided for including provision of information to the pilot-in-command.

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*Editorial Note.*— renumber subsequent paragraphs

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