



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
MEETING OF THE WORKING GROUP OF THE WHOLE**

Montréal, 15 to 19 October 2012

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air (Doc 9284)* for incorporation in the 2015-2016 Edition

2.2: Part 2 — Classification

**EXCEPTIONS FOR MEDICAL DEVICES OR EQUIPMENT CONTAINING INFECTIOUS
SUBSTANCES**

(Presented by the Secretary)

SUMMARY

This paper invites the working group to consider whether a proposed amendment to the UN Model Regulations by COSTHA addresses concerns raised by DGP/23 on exceptions for medical devices or equipment containing infectious substances.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 Concerns related to new exceptions introduced in the 17th Revised Edition of the UN Model Regulations for medical devices or equipment containing infectious substances (paragraph 2.6.3.2.3.7 of the UN Model Regulations) were raised at DGP/23 (see paragraph 2.3.5 of the DGP/23 Report (DGP/23-WP/102)). These exceptions were adopted in the Technical Instructions in the interest of intermodal harmonization, but the panel felt that their concerns should be addressed at the UN.

1.2 The concerns included:

- a) the possibility of applying the exceptions to smaller-sized equipment with Category B infectious substances present (since there was no definition limiting the size of medical devices and equipment);
- b) ambiguity with the intent of the drop test, i.e. what was meant by “capable of retaining the medical devices and equipment”; and

- c) the feasibility of performing the drop test on large equipment.

1.2.1 The note adopted by the UN under paragraph 2.6.3.2.3.3 excepting medical equipment drained of free liquid and meeting the requirements of the new provisions was not adopted by DGP/23, as it was felt it contradicted the new requirements in 2.6.3.2.3.7 of the Model Regulations and could result in unregulated shipments of infectious substances.

1.3 A paper addressing these issues was presented by ICAO at the Forty-first session of the Sub-Committee of Experts on the Transport of Dangerous Goods (Geneva, 25 June – 4 July 2012) (ST/SG/AC.10/C.3/2012/24). The Council on Safe Transportation of Hazardous Articles (COSTHA) raised similar concerns to the UN (ST/SG/AC.10/C.3/2012/31) and has since addressed them and additional issues in a paper to be presented at the 42nd Session of the Sub-Committee (ST/SG/AC.10/C.3/2012/92). This paper is provided in the appendix to this working paper.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to consider whether the amendments to the UN Model Regulations proposed by COSTHA address the concerns related to exceptions for medical devices or equipment containing infectious substances raised at DGP/23 and to provide comments for the Secretary to bring to the December meeting. If necessary, a proposal for amendment to the Technical Instructions will be presented at DGP-WG/13.

APPENDIX

**WORKING PAPER PREPARED BY COSTHA FOR THE 42ND SESSION OF THE UN SUB
COMMITTEE**