DANGEROUS GOODS PANEL

Dubai, 31 March to 4 April 2003

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

INFECTIOUS SUBSTANCES IN PACKING INSTRUCTION 650

(Presented by W. Schuurman)

1. BACKGROUND

1.1 There has been a lengthy discussion going on for several years now on how to handle the problems concerning shipments of diagnostic specimens by air transport. Although significant changes have come into effect in the current 2003/4 edition of the Technical Instructions, the consequences of these changes have never been discussed at the Panel itself. It has been decided instead, at the Frankfurt meeting, to await discussions and decisions taken at the UN Subcommittee of Experts meeting last December 2002. This has contributed to confusion throughout the industry, which indicates that matters have not been well thought-out.

1.2 To give one example - questions have been asked whether shippers can now dispatch all diagnostic specimens being sent away for Hepatitis A, B or C screening as diagnostics under PI 650 when these shipments previously had to be sent as UN2814 under PI 602.

1.3 A large number of substances previously shipped as UN2814 or UN2900 can now be shipped as Diagnostic Specimens (PI 650). PI 650 states that no Shipper's Declaration is required and no other requirements of the Technical Instructions are applicable, except for the definition and reporting. Consequently, marking, labelling, documentation and acceptance checks are no longer required for Risk Group 2 and 3 Infectious Substances which will not enhance safety.

1.4 Of course, specimens containing pathogens of Risk Group 2 or 3 transported for any other purpose than diagnostic or investigational purposes and biological products containing pathogens in risk groups 2 and 3 must still be classified under UN2814 or UN2900. However, it is highly questionable why specimens containing pathogens of Risk Group 2 and 3 transported for diagnostic or investigational purposes, can now go under PI 650 while the properties of the substances have not changed.

1.5 IFALPA does not want to argue that PI 650 is appropriate for Diagnostic Specimens. There are however consequences which have to be realised when assigning substances to this packing instruction. The use of PI 650 compliant packaging cannot be ensured and enforced when there is no requirement for marking, labelling, manifesting and acceptance checks. It cannot be assured that non-transport experts will use the system as designed if this is not being checked.

1.6 Shipping infectious substances containing pathogens meeting the criteria for Risk Groups 2 and 3 by air requires a cautious approach. Contrary to the other modes of transport, aircraft cargo compartments and passenger/crew compartments are very close to one another and often share ventilation systems. Additionally, for due reason, has this panel decided in the past that stronger packing requirements for Division 6.2 are necessary.

1.7 Quality assurance is indispensable when shipping infectious substances and cannot be the responsibility of the shipper alone, one of the tools required is the acceptance check by an airline. Furthermore is it impossible for emergency responders to counteract any problem that may arise if the cause of the problem is not unmistakably identifiable, to this effect manifesting, notification and labelling is needed.

1.8 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 and will not change in the Category A/B philosophy.

1.9 IFALPA strongly believes that exclusion of Risk Group 2 and 3 Infectious Substances from UN2814 is contrary to the philosophy of safe transport of dangerous goods by air as laid down in Annex 18 and the Technical Instructions.

1.10 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 kept in place.

2. PROPOSAL

2.1 IFALPA recommends the Panel to review the consequences of the current and forthcoming changes in the regulations when shipping infectious substances and diagnostic specimens.

2.2 Appropriate steps must be taken to ensure that the current standards in the Technical Instructions for the safe transport of known dangerous goods, including quality control and emergency response, will be maintained.

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