



WORKING PAPER

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

Rio de Janeiro, Brazil, 20 to 24 October 2014

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 2017-2018 Edition

2.4: Part 4 — Packing Instructions

TRAINING REQUIREMENTS FOR UN 3373

(Presented by B. Carrara)

SUMMARY

This working paper proposes to include a requirement in Packing Instruction 650 for operator's staff to be trained.

Action by the DGP-WG: The DGP-WG is invited to revise Packing Instruction 650 to include a training requirement for operators as shown in the appendix to this working paper.

1. INTRODUCTION

1.1 The transport of UN 3373, **Biological substance, Category B**, must follow the requirements of Packing Instruction 650.

1.2 Paragraph 11 of Packing Instruction 650 provides for infectious substances assigned to UN 3373 which are packed and marked in accordance with Packing Instruction 650 to not be subject to any other requirement of the Technical Instructions except for items written in paragraph 11.

1.3 Paragraph 11 of Packing Instruction 650 does not include any kind of training requirements similar to the ones presented in Part 1, Chapter 4 of the Technical Instructions.

1.4 It is understood that the purpose of a training exemption for shippers or any other entity shipping infectious substances assigned to UN 3373 is based on social and public health issues in order to facilitate the transport of these substances. However, such training exemption occurred widely and included operators. Thus, according to what is written in the current Packing Instruction 650, an operator might determine that there is no need for any kind of training to accept UN 3373.

1.5 Monthly reports received by ANAC in accordance with State Variation BR 3 indicate that domestic transportation of UN 3373 in Brazil represents more than 20 per cent of all volume of dangerous goods transported by air.

1.6 Between 2011 and 2012, Brazil received a considerable number of reports of occurrences involving infectious substances assigned to UN 3373. Some of them were related to problems on acceptance and others were related to other stages of transport such as handling procedures.

1.7 Based on this, ANAC conducted specific training for various entities involved in the air transport of such substance, including: Health Surveillance Agency; operators; hematology centers; hospitals; Ministry of Health; packaging manufacturers; DPO, dangerous goods instructors; and specialized freight forwarders. The number of reported occurrences decreased, indicating that such training was effective.

1.8 Nevertheless, as there were continued doubts, ANAC decided to develop an explanatory regulation to ship and transport this type of substance (IS 175-004), based on Packing Instruction 650 of the Technical Instructions.

1.9 Despite all efforts, recent inspections indicate that operators in Brazil continue to accept UN 3373 consignments which do not comply with Packing Instruction 650. It was noted that operator acceptance staff that do not have adequate training were accepting UN 3373; however, current Technical Instruction requirements do not consider the absence of training for these employees to be non-compliant.

1.10 It is considered that one of the main ways to avoid an occurrence such as an incident or accident involving dangerous goods is based on the correct acceptance procedure executed by trained operator's staff. Currently, according to Packing Instruction 650 of the Technical Instructions, training is not required when shipping or accepting infectious substances assigned to UN 3373 for air transportation.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to revise Packing Instruction 650 to include a training requirement for operators as shown in the appendix to this working paper.

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APPENDIX

PROPOSED AMENDMENT TO PART 4 OF THE TECHNICAL INSTRUCTIONS

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Part 4

PACKING INSTRUCTIONS

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Chapter 8

CLASS 6 — TOXIC AND INFECTIOUS SUBSTANCES

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Packing Instruction 650	3.
This packing instruction applies to UN 3373.	
1) The packaging must be of good quality, strong enough to withstand the shocks and loadings normally encountered during transport, including transshipment between transport units and between transport units and warehouses as well as any removal from a pallet or overpack for subsequent manual or mechanical handling. Packagings must be constructed and closed to prevent any loss of contents that might be caused under normal conditions of transport by vibration or by changes in temperature, humidity or pressure.	
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10) When packages are placed in an overpack, the package markings required by this packing instruction must either be clearly visible or the markings must be reproduced on the outside of the overpack and the overpack must be marked with the word "Overpack".	
11) Infectious substances assigned to UN 3373 which are packed and marked in accordance with this packing instruction are not subject to any other requirement in these Instructions except for the following:	
a) the name and address of the shipper and of the consignee must be provided on each package;	
b) the name and telephone number of a person responsible must be provided on a written document (such as an air waybill) or on the package;	
c) classification must be in accordance with 2;6.3.2;	
d) the incident reporting requirements in 7;4.4 must be met;	
e) the inspection for damage or leakage requirements in 7;3.1.3 and 7;3.1.4; and	
f) passengers and crew members are prohibited from transporting infectious substances either as, or in, carry-on baggage or checked baggage or on their person; <u>and</u>	
<u>g) operator's staff must be trained in accordance with 1:4.</u>	
<i>Note.— When the shipper or consignee is also the "person responsible" as referred to in b), the name and address need be marked only once in order to satisfy the name and marking provisions in both a) and b).</i>	
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