



The European Communities (Carriage of Dangerous Goods by Road and Use of Transportable Pressure Equipment) Regulations 2011 and 2013

Competent Authority Exemption 03/2014, Rev.1

Applicable To National Road Transport Only

The carriage of clinical waste containing a Category A Infectious Substance - Ebola virus

In accordance with the provisions of ADR, the Health and Safety Authority, as competent authority appointed under Regulation 10 of the European Communities (Carriage of Dangerous Goods by Road and Use of Transportable Pressure Equipment) Regulations 2011 and 2013, and in accordance with Regulation 5 (4) (a) of the said regulations, hereby exempts the relevant participant from ADR 4.1.4.1, P620. The relevant participant(s) shall, however, comply with the provisions contained in this document.

Purpose

To allow the relevant participant to ensure that medical or clinical waste containing the Ebola virus, UN No. 2814, infectious substance affecting humans shall be packed in packaging designed and constructed in such a way as to provide an equivalent level of protection for carriage by road.

The following provisions shall be complied with:

1. Medical or clinical wastes suspected of containing the Ebola virus shall not be transported by road until a diagnosis of the patient/source has been confirmed. Pending diagnosis, the waste shall be packaged in accordance with provision 1(a) below and stored in an appropriate secure location at the healthcare facility.

If the diagnosis is proven to be negative, the waste shall be treated as infectious substances Category B Waste (UN No. 3291) and consigned in accordance with standard clinical waste procedures as appropriate.

In the event of a positive diagnosis, the waste shall be treated as infectious substances Category A waste (UN No. 2814), and additional packaging procedures shall be used, in accordance with provision 1(b).

1(a) Packaging used pending diagnosis of the patient:

Sharps waste (e.g. needles, syringes):

Primary packaging	Plastic rigid sharps bin (3H2) meeting the requirements of packaging instruction P621 of the ADR.
Secondary packaging	2 layers of plastic bags (5H4) meeting the relevant construction and testing requirements of chapter 6 of the ADR.
Tertiary packaging	Plastic rigid drum (1H2, 3H2, 30/60litre), with sufficient absorbent material to absorb the entire amount of liquid present, meeting the requirements of P621 of the ADR. (Clinical waste bags to be in-situ within the clinical waste rigid bin prior to adding primary waste package)

Soft waste (e.g.. gloves, aprons, bandages):

Primary packaging	Plastic bag (5H4) meeting the relevant construction and testing requirements of chapter 6 of the ADR.
Secondary packaging	Plastic bag (5H4) meeting the relevant construction and testing requirements of chapter 6 of the ADR.
Tertiary packaging	Plastic rigid drum (1H2, 3H2, 30/60litre), with sufficient absorbent material to absorb the entire amount of liquid present, meeting the requirements of P621 of the ADR. (Clinical waste bags to be in-situ within the clinical waste rigid bin prior to adding waste)

Liquid Waste (e.g. urine bags, tubing):

Primary packaging	Plastic bag (5H4) meeting the relevant construction and testing requirements of chapter 6 of the ADR.
Secondary packaging	Plastic bag (5H4) meeting the relevant construction and testing requirements of chapter 6 of the ADR.
Tertiary packaging	Plastic rigid drum (1H2, 3H2, maximum capacity 30litres), with sufficient absorbent material to absorb the entire amount of liquid present*, meeting the requirements of P621 of the ADR. (Clinical waste bags to be in-situ within the clinical waste rigid bin prior to adding waste)

*See packaging and handling procedures No.5.

1(b) Packaging used in the case of a positive diagnosis for the Ebola virus:

Sharps waste (e.g. needles, syringes):

Following decontamination (see packaging and handling procedures No.7), the waste package generated following 1(a) shall be packaged in one of the following types of outer packaging with a plastic liner and absorbent material:

- Plastic drum, removable head (1H2)
- Steel drum, removable head (1A2)
- Plastic box, solid (4H2)
- Large Plastic rigid packaging (50H)

Soft waste (e.g. gloves, aprons, bandages):

Following decontamination (see packaging and handling procedures No.7), the waste package generated following 1(a) shall be packaged in one of the following types of outer packaging with a plastic liner and absorbent material:

- Plastic drum, removable head (1H2)
- Steel drum, removable head (1A2)
- Plastic box, solid (4H2)
- Large Plastic rigid packaging (50H)

Liquid Waste (e.g. urine bags, tubing):

Following decontamination (see packaging and handling procedures No.7), the waste package generated following 1(a) shall be packaged in one of the following types of outer packaging with a plastic liner and sufficient absorbent material:

- Plastic drum, removable head (1H2, packing group II performance level for liquids)
- Steel drum, removable head (1A2, packing group II performance level for liquids)

Packaging and Handling Procedures

1. An emergency response procedure shall be in place and appropriate training shall be provided for staff involved in the transport of Category A waste.
2. Inner packagings containing infectious substances shall not be consolidated with inner packagings containing unrelated types of goods.
3. Other dangerous goods shall not be packaged in the same packaging as infectious substances unless necessary for neutralising the hazards of the infectious substance.
4. All plastic bags forming part of packaging 1(a) and 1(b) shall be individually closed following standard procedures for the closure of bags used in category A packaging, i.e. create a "swan neck" and use a cable tie to effect a closure.
5. For the liquid stream of waste, a procedure shall be in place which will ensure that the quantity of liquid waste to be placed into the tertiary packaging (1H2, 3H2, 30litre) is less than 50% of the maximum capacity of the absorbent material.
6. The packaging for the liquid stream of waste shall be clearly labelled as 'liquid waste'.
7. The tertiary clinical waste rigid bin [package prepared as in 1(a)] shall be decontaminated with a 1% hypochlorite solution prior to removal from isolation room within the healthcare facility.
8. Appropriate general and personal protective clothing and equipment shall be provided and used by staff involved in the handling, loading and unloading of the waste packaging. Training and appropriate supervision must be provided.
9. Two qualified ADR licensed drivers shall accompany each load. The waste shall be transported in a refrigerated vehicle. Only Category A waste shall be consigned on the vehicle for any individual transport operation. Emergency procedures shall be in place in the event of an incident during carriage.
10. Decontamination procedures shall be put in place for vehicles involved in the carriage of the waste.
11. A copy of this exemption must accompany the transport documentation and shall be made available to anyone having a legitimate interest in the shipment.

12. This document shall not be used as documentary proof of correct classification. Classification remains the responsibility of the consignor.
13. Any incident resulting in loss of containment of a substance during the transport journey shall be reported immediately in writing to this Authority.
14. The Authority may withdraw this exemption for failure to observe any of these conditions, or for any other reason which the Authority deems sufficient.
15. Any application for renewal of this exemption must be accompanied by a list of any incidents involving the substance(s) that may have occurred. A nil return is required.
16. In all other respects the relevant requirements of ADR shall be complied with.
17. This exemption is valid until the date of expiry.

This exemption is effective immediately and expires on **31st December 2015**.

Martin O'Halloran

21st October 2014

Martin O'Halloran
CEO
Health and Safety Authority

