

European Communities (Carriage of Dangerous Goods by Road and Use of Transportable Pressure Equipment) Regulations, 2011 (S.I. No. 349 of 2011) as amended¹

Information note on the carriage by road of UN No. 3373, BIOLOGICAL SUBSTANCE, CATEGORY B

Infectious substances in Category B are assigned to UN 3373, proper shipping name "BIOLOGICAL SUBSTANCE, CATEGORY B", and must be packaged for carriage by road in accordance with ADR **Packing Instruction P650**.² The system for packaging UN 3373 is a three layer system, of which either the secondary packaging or the outer packaging **must be rigid**:

- Primary receptacle
- Secondary packaging
- Outer packaging

It is the responsibility of the **consignor** of infectious substances assigned to UN3373 to ensure that the packaging complies with all of the requirements of Packing Instruction P650. Consignors of UN 3373 may be nursing homes, doctors, dentists, the HSE (hospitals and primary care clinics), and personnel working in clinics, nursing homes, hospitals and surgeries must receive specific training in the correct classification of the infectious substances to be carried, and the application of P650.

Consignors may enter into a CONTRACT FOR CARRIAGE³ with a carrier, for example, a courier company, under the terms of which the carrier may assume part of the consignor's role as packer of the dangerous goods. In the absence of a contract for carriage, it **remains the responsibility of the consignor to apply all layers of packaging and mark the package in accordance with P650**.

¹ See Legislation - Health and Safety Authority (hsa.ie)

² Guidance for the carriage of infectious substances (Class 6.2) is provided and updated biennially by the World Health Organisation (WHO). The <u>WHO publication</u> (available on the HSA website), provides information for classifying, marking, labelling, packaging, documenting and refrigerating infectious substances using all modes of transport, both nationally and internationally. The details of Packing Instruction P650 are provided in **Annex** 4 of the publication.

³ See section 3 of the HSA publication: <u>Carriage of Dangerous Goods by Road</u> for guidance on 'contract for carriage'



Mark applied to outer surface:

This must be applied along with the Proper Shipping Name
BIOLOGICAL SUBSTANCE, CATEGORY B



Packaging **designed** to meet P650 shall be provided with clear instructions on use and closure of such packages. These instructions will be provided by the packaging manufacturer to the consignor (including the person who prepares the package), to enable the package to be correctly prepared for carriage.

Where there are **no instructions** from the manufacturer (for example, when the packaging is put together by the consignor in accordance with P650), it is the responsibility of the **consignor** to provide clear instructions to all relevant staff on how to do so. If the packaging is prepared by the consignor, results of a **drop test** must be retained to demonstrate suitability for the carriage of UN 3373 (the details of the drop test are provided in ADR 6.3.5.3, drop height 1.2m). Following the appropriate drop sequence, there must be no leakage from the primary receptacle, which, will be protected by absorbent material in the secondary packaging.

Packages of infectious substances assigned to UN3373, when packaged in accordance with P650, are not subject to any other requirements of the ADR.

If you found this information note useful, you may also be interested in the HSA publication: <u>Carriage of Dangerous Goods by Road</u>, in particular, the consignment of clinical and pharmacy wastes, and exempt human or animal specimens (section 18.4, example 3) and carriage of clinical waste under ADR exemption 1.1.3.1(c) (section 18.4, example 4).

For further assistance in any of these matters, please seek the advice of a dangerous goods safety adviser (DGSA) (see section 4 of the HSA publication: <u>Carriage of Dangerous Goods by Road</u>).