Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Transport of Dangerous Goods

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Global harmonization of transport of dangerous goods
regulations with the Model Regulations

Information on recommendations made by the ICAO Dangerous Goods Panel

Submitted by the International Civil Aviation Organization (ICAO)

Introduction

- 1. The twenty-seventh meeting of the Dangerous Goods Panel (DGP/27) was held in Montréal from 16 to 20 September 2019. The panel followed two working group meetings also held Montréal from 1 to 5 October 2018 (DGP-WG/18) and 1 to 5 April 2019 (DGP-WG/19). The panel made a final review of amendments proposed to the Technical Instructions in order to harmonize with the 21st revised edition of the UN Model Regulations and to address issues specific to air transport. Amendments agreed by DGP/27 are subject to Council approval. They will first be reviewed by the Air Navigation Commission (ANC) for onward submission to the Council during the first quarter of 2020. The full report of DGP/27 including all amendments agreed will be available for downloaded at http://www.icao.int/safety/DangerousGoods/Pages/DGP27.aspx.
- 2. This information paper highlights issues which the DGP determined should be brought to the attention of the 56th Session of the Sub-Committee.

References to provisions for which transport of excepted packages of radioactive material apply

- 3. The list of references in Part 1, paragraph 6.1.5.1 of the Technical Instructions to provisions for which transport of excepted packages of radioactive material would apply was updated to align with revisions to the list contained in 1.5.1.5.1 a) of the Model Regulations. DGP-WG/19 considered some of the additions to be illogical and had placed them in square brackets pending further review. These are highlighted in paragraph 3 of ST/SG/AC.10/C.3/2019/58. DGP/27 further modified the list by removing references it considered as unnecessary. These are:
 - (a) Reference to the package orientation arrow provisions in 5.2.1.7 of the Model Regulations (5;3.2.12 b) of the Technical Instructions). This reference is not included in the current edition of the Technical Instructions. DGP/27 considered adding it, but did not consider it necessary. It is not included in the Technical Instructions.
 - (b) Reference to the documentation provisions for consignments required to be shipped under exclusive use in 5.4.1.5.7.1 i) of the Model Regulations (5;4.1.5.7.1 i) of the Technical Instructions). DGP/27 considered a reference to this provision to be

irrelevant, since excepted packages of radioactive material required to be shipped under exclusive use would never be transported by air. The reference was therefore not added. As a consequence, DGP/27 also deleted the reference to 7.1.8.4.3 of the Model Regulations (7;2.9.4.3 of the Technical Instructions) regarding fissile material considered to be excepted in accordance with one of the provisions in (a) to (f) of 2.7.2.3.5 (2;7.2.3.5 of the Technical Instructions).

UN 2908 - Radioactive material, excepted package - empty packaging

4. DGP-WG/19 revised the new classification criteria for UN 2908 — **Radioactive material, excepted package** added to 2.7.2.4.1.7 (e) of the UN Model Regulations (see paragraph 7 of ST/SG/AC.10/C.3/2019/58). DGP/27 made further revisions to the criteria, i.e.:

2;7.2.4.1.1.7 An empty packaging which had previously contained radioactive material may be classified under UN 2908 — **Radioactive material, excepted package** — **empty packaging** provided that:

. . .

e) if the packaging has contained fissile material, one of the provisions of 7.2.3.5.1 a) to f) or one of the provisions for exclusion for fissile nuclides, as described in the definition for fissile nuclides in 7.1.3, must apply.

Criteria for determining the transport index for overpacks or freight containers

5. DGP-WG/19 considered the revisions to the criteria for determining the transport index for overpacks or freight containers introduced into 5.1.5.3.2 of the Model Regulations (Part 5; 1.2.3.1.2 of the Technical Instructions) to be unclear (see paragraph 9 of ST/SG/AC.10/C.3/2019/58). The text in the Model Regulations is as follows:

"The TI for each rigid overpack, freight container or conveyance shall be determined as the sum of the TIs of all the packages contained therein. For a shipment from a single consignor, the consignor may determine the TI by direct measurement of dose rate.

The TI for a non-rigid overpack shall be determined only as the sum of the TIs of all the packages within the overpack.".

6. DGP/27 agreed to the following revision to the Technical Instructions:

5;1.2.3.1.2 The transport index for each overpack or freight container must be determined as either—the sum of the transport indices of all the packages contained therein. However, for a rigid overpack, or a freight container from one single shipper, the shipper may determine the transport index by direct measurement of radiation level, except in the case of dose rate. The transport index for a non-rigid overpacks for which the transport index must be determined only as the sum of the transport indices of all the packages, within the overpack.

Marking requirements for radioactive material

7. New marking requirements for radioactive material added to 5.2.1.5.6 of the Model Regulations incorrectly refer to the UN number and proper shipping name assigned to a *consignment* (see paragraph 11 of ST/SG/AC.10/C.3/2019/58). DGP/27 removed "assigned to the consignment" from Part 5;2.4.5.5 of the Technical Instructions.

Information required for radioactive material consignments

- 8. DGP/27 considered the text in 5.4.1.5.7.1 of the Model Regulations, which is based on a change from the IAEA, to be wrong and therefore revised it to read:
 - d) The category of the package and if applicable for the overpack and freight container, as assigned per 1.2.3.1.4, i.e. I-WHITE, II-YELLOW, III-YELLOW;

Conclusion

9. The DGP Secretary was requested to raise the above issues to the Sub-Committee and to consider whether amendments to Model Regulations should be considered. Additional details can be found in the DGP/27 Report, which will be available for download at http://www.icao.int/safety/DangerousGoods/Pages/DGP27.aspx. Discussions related to harmonization between the Technical Instructions and the UN Model Regulations are reported under Agenda Item 1 to the report.

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