

**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**

**(Twenty-second session, 2-6 December 2002,
agenda item 4 (a))**

NEW PROPOSALS

COMMENTS ON ST/SG/AC.10/C.3/2002/65

Transmitted by the International Atomic Energy Agency (IAEA)

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1. ST/SG/AC.10/C.3/2002/65 presents a proposal for Chapter 1.4 of the Model Regulations, with a proposed title of "Security Provisions". This proposal includes recommendations for added requirements for security purposes for Class 7, radioactive material. Specifically, in Table 1 of the proposal, it defines radioactive material in quantities greater than A_1 or A_2 in Type B and Type C packagings as being "Particularly Sensitive Dangerous Goods". Commensurate with that designation is the imposition of additional steps to be taken such as those specified in the proposed paragraphs 1.4.2 through 1.4.10 and 7.2.4.3.
2. The International Atomic Energy Agency (IAEA) has undertaken a detailed study of requirements that may need to be imposed for security in the transport of radioactive material. The first phase of this study has considered a graded approach to assigning requirements based on the activity of the contents of a conveyance (not a package), and preliminary conclusions are that some multiple of the A_1 or A_2 values for the conveyance will be the logical threshold for applying special security requirements. That study, however, has not been completed at this time.
3. At a meeting of experts convened for this purpose during 21-24 October 2002, the proposal set forth in ST/SG/AC.10/C.3/2002/65 was reviewed and discussed in detail. It was the conclusion of the experts that the proposed addition of Class 7 radioactive material to the list of "Particularly Sensitive Dangerous Goods" is not advisable at this time because the IAEA is at work formulating a sound, unified approach for security to be applied to the transport of all radioactive material. The experts further noted that it is expected that this effort will be largely completed within about one year, and it is anticipated that, at that time, quantities of specific radionuclides will have been identified where associated security requirements will be recommended in an appropriate IAEA document¹. The experts further noted that the threshold for application of the designation of "Particularly Sensitive Dangerous Goods" for radioactive material as currently specified in ST/SG/AC.10/C.3/2002/65 was viewed as being too low and would represent an excessive level of conservatism.
4. The experts who met in October 2002 also recommended that a note 3 be added to the proposed text of Chapter 1.4. The note should call attention to the fact that nuclear materials (those which could have utility in developing nuclear weapons) have security recommendations in INFCIRC/225 (Rev. 4) which

¹ *Once the study has been completed and the recommendations developed, these results will be transmitted to the UN Committee of Experts for its further consideration for addition to the Model Regulations.*

specify security measures for material shipped between nations that are signatories to the Convention on the Physical Protection of Nuclear Materials.

5. Thus, the IAEA recommends the following actions with regard to ST/SG/AC.10/C.3/2002/65:

- a) The specification of "Class 7, radioactive material in quantities greater than A₁ or A₂ in Type B packagings" should be deleted from the proposed Table 1 of Chapter 1.4 as set forth in ST/SG/AC.10/C.3/2002/65 pending conclusion of the efforts currently underway as described in paras. 2 and 3 above, and apply this requirement only to Type C packages; and
- b) Note 3 should be added to the proposed Table 1 to read as follows:

***NOTE 3:** For purposes of non-proliferation of nuclear material, the convention on Physical Protection of Nuclear Material applies to international transport, supported by IAEA INFCIRC/225 (Rev. 4)."*