

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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Item 8 of the provisional agenda

Cooperation with the International Atomic Energy Agency (IAEA)

Comments on ST/SG/AC.10/C.3/2010/78 Provisions for uranium hexafluoride with less than 0,1 kg per package (IAEA)

Transmitted by the expert from Sweden

Introduction

1. The expert from Sweden supports the proposal in principle, but has a few comments about the drafted text which should be considered when discussing the proposal.

Discussion

2. One editorial remark concerns the numbering of the new provision under point 4 in the proposal. In the Model Regulation we do not use “bis” as part of the numbering. Therefore, the proposed paragraph “2.7.2.4.1.4bis” should be renumbered in accordance with the structure used in the regulation. Another comment of editorial nature concerns the first paragraph under the proposed special provision 3XXY where “4.9.1.5” should read “4.1.9.1.5”.

3. Furthermore, in the first paragraph in SP 3XXY it does not seem appropriate to state “except 5.2.1.5.2” in the third line. Partly because paragraph 5.2.1.5.2 is not included in 1.5.1.5 and partly because this reference contradicts what is currently stated in the second paragraph about marking. Therefore, the expert from Sweden believes the wording in the first paragraph should be amended. It seems more appropriate to except 5.1.5.4.1 (b) and (c) in the first paragraph.

4. In addition, the requirement about marking on the package is already stated in 5.1.5.4.1 (a), which applies for excepted packages according to 1.5.1.5. If the text is amended as proposed above then, as a result, the second paragraph about marking is superfluous and could be deleted.

5. The third paragraph deals with documentation. The expert from Sweden questions the references to paragraphs 5.4.1.5.7 and 5.4.1.4.1, because these paragraphs are not mentioned in 1.5.1.5 for excepted packages. If the requirement for documentation for this UN number should be different from the other UN numbers for excepted packages, it would be more user-friendly to state what is required for the documentation without making references to other parts in the regulation. As a consequence it would be appropriate to also except paragraph 5.1.5.4.2 in the first paragraph. The last paragraph should be reworded to harmonise with other texts dealing with documentation in the special provisions.

6. Lastly, the expert from Sweden suggests rephrasing the beginning of the first sentence of the special provision as shown below.

Proposal

7. If the Sub-Committee agrees with the comments expressed above, the text in the proposed special provision should be amended accordingly. The expert from Sweden proposes that the new SPXXY reads as follows (new text underlined, removed text is striken out):

“~~SPXXY - This material shall be transported in accordance with the provisions applicable to that UN number.~~ In addition to the provisions applicable to this UN number, all other requirements specified in 1.5.1.5 and ~~4.9.1.5~~ 4.1.9.1.5 shall apply, ~~except 5.2.1.5.2~~ except 5.1.5.4.1 (b)-(c) and 5.1.5.4.2.”

For labelling, only a label conforming to model No 8 is required.

For marking, the mark “UN 3XXX” shall be displayed on the package, in accordance with 5.2.1.1 and 5.2.1.5.2.

For the purpose of documentation, ~~in accordance with 5.4.1.4.1 and notwithstanding the provisions of 5.4.1.5.7,~~ the description in the transport document shall be as ~~followed~~ follows:

“UN 3XXX RADIOACTIVE MATERIAL, EXCEPTED PACKAGE - URANIUM HEXAFLUORIDE, less than 0.1 kg per package, 7 (8) I”.”
