

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

16 August 2011

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Geneva, 13-23 September 2011

Item 5 of the provisional agenda

Interpretation of RID/ADR/ADN

Fissile Material – Differences between RID/ADR/ADN and other texts

Transmitted by the Government of the United Kingdom

Introduction

1. The United Kingdom has identified text in RID/ADR/ADN relating to the carriage of fissile material which differs to text for the transport of fissile material contained within the IAEA Regulations for the Safe Transport of Radioactive Material (TS-R-1), the UN Model Regulations and the IMDG code. Specifically, this relates to whether placards are required on a wagon or vehicle carrying packages of fissile material which are labelled accordingly.

2. Notwithstanding that RID/ADR/ADN is the legislative text, the United Kingdom believes that comparison of the texts could lead to multiple interpretations and would like the Joint Meeting's interpretation of the text concerned.

3. In 5.3.1.1.1 of RID/ADR/ADN it is stated "As and when required in this section ..." and that placards shall conform to 5.3.1.7. Neither 5.3.1.7 nor 5.3.1.1.3 refers to a fissile placard. However also in paragraph 5.3.1.1.1 it is stated that:

"Placards shall correspond to the labels required in Column (5) and, where appropriate, Column (6) of Table A of Chapter 3.2 ...".

Therefore, if Table A requires a Fissile label in Column (5), it could be understood that a corresponding placard would also be required, unless a Special Provision appropriate to the UN Number in Column (6) is identified which removes this requirement. The United Kingdom has not been able to identify any entries for fissile material which have such Special Provisions allocated. This could lead to the conclusion that a Fissile placard is required in RID/ADR/ADN.

4. TS-R-1 paragraph 567 specifically states that only the Class 7 placard is required on road/rail vehicles carrying packages of Class 7 including those displaying the CSI 'Fissile' label. Both the UN Model Regulations (see 5.3.1.1.5.2) and the IMDG Code (see 5.3.1.1.5.2) agree with this provision for the placarding of rail and road vehicles. Please see the annex to this paper for the relevant extracts of texts.

5. The United Kingdom would like the opinion of the Joint Meeting as to whether there was a conscious decision for RID/ADR/ADN to have different provisions for the

placarding of Class 7 than is presented in TS-R-1, the UN Model Regulations and the IMDG code?

6. If the Joint Meeting agrees with the UK that the difference between RID/ADR/ADN and other texts is unintentional then the Joint Meeting may wish to consider the following proposed amendment to 5.3.1.1.3.

Proposal

7. At the end of the first paragraph of 5.3.1.1.3, add the following sentence:

“No placard corresponding to label model No. 7E is required”

Annex

TS-R-1 – Paragraph 567

“567. Rail and road *vehicles* carrying *packages, overpacks* or *freight containers* labelled with any of the labels shown in Figs 2, 3, 4 or 5, or carrying *consignments* under *exclusive use*, shall display the placard shown in Fig 6...”

UN Model Regulations – 5.3.1.1.5.2

“5.3.1.1.5.2 Rail and road vehicles carrying packages, overpacks or freight containers labelled with any of the labels shown in 5.2.2.2.2 as models No. 7A, 7B, 7C, or 7E, or carrying consignments under exclusive use, shall display the placard shown in Figure 5.3.1 (Model 7D)...”

IMDG Code – 5.3.1.1.5.2

“5.3.1.1.5.2 Rail and road vehicles carrying packages, overpacks or freight containers labelled with any of the labels shown in 5.2.2.2.2 as models Nos. 7A, 7B, 7C, or 7E, or carrying consignments under exclusive use, shall display the placard shown in the figure (model No. 7D)...”