

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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MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Amendment to 1.5.1.5.1 Class 7: requirements and controls for transport of excepted packages

Transmitted by the expert from the United Kingdom

Background

1. Part 1.5.1.5.1 in ST/SG/AC.10/C.3/58 Add 2 produced by the Secretariat contains the new text for excepted packages (UN numbers 2908 to 2911) agreed by the Sub-Committee during the July 2006 discussions on the harmonization of the UN Model Regulations and those produced by the IAEA. The expert from the United Kingdom reminds the Sub-Committee that the text for excepted packages is currently in section 2.7.9.1 of the 14th Edition of the Model Regulations.
2. However, no reference is made to any requirement for training. This would appear to be consistent with the IAEA texts where the Requirements and Controls for Transport of Excepted Packages (paragraphs 515 to 520) state that excepted packages are subject only to certain provisions in Sections V and VI (para. 515). This would appear to exclude application of the training requirements of TS-R-1 which are set out in Section III, paragraphs 311 to 314. However, it is believed that this is not the intent of the IAEA and that the provisions of Section III should apply. Perhaps the IAEA could be asked to clarify the position. During the recent ICAO DGP Working Group meeting, it was pointed out by the expert from the United Kingdom that this lack of a training requirement would appear to be inconsistent with the excepted quantity provisions for dangerous goods (other than Class 7) agreed at the previous session of the Sub-Committee where training is required (see page 8 of ST/SG/AC.10/C.3/58 Add 1). This would also be at variance with the usual air transport approach for training requirements. Amendment to the TIs to apply general awareness training was adopted. It is noted, however, that in European land transport provisions UN numbers 2908 to 2911 are exempted from driver training requirements by S5 in Chapter 8.5 but apparently not from the general awareness training requirements of Chapter 1.3

3. The expert from the United Kingdom would like the guidance of the Sub-Committee on whether it too considers the current omission of training requirements for the transport of radioactive material in excepted packages to be inconsistent. If that is the case, the expert from the United Kingdom makes the following proposal to remove this inconsistency:

Proposal

3. It is proposed to amend part 1.5.1.5.1 (a) as follows:

1.5.1.5.1 Excepted packages which may contain radioactive material in limited quantities, instruments, manufactured articles as specified in 2.7.7.1.2 and empty packaging as specified in 2.7.9.6 may be transported under the following conditions:

(a) The applicable requirements specified in 1.3, 2.0.3.2, 2.7.9.2.....
