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**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

Thirty-fourth session
Geneva, 1-9 December 2008
Item 8 of the provisional agenda

**HARMONIZATION WITH THE INTERNATIONAL ATOMIC ENERGY AGENCY (IAEA)
REGULATIONS FOR THE SAFE TRANSPORT OF RADIOACTIVE MATERIAL**

Provisions applicable to radioactive excepted packages

Transmitted by the International Air Transport Association (IATA)¹

Introduction

1. At the thirty-second session of the Sub-Committee in December 2007, informal document UN/SCETDG/33/INF.13 submitted by the secretariat contained a number of recommendations resulting from the IAEA Consultant Services (CS-72) on Harmonization between the UN and IAEA Transport Regulations in September 2007.
2. Recommendation 5 in the report from the Consultant Services meeting proposed that the Sub-Committee amend section 1.5.1.5 with respect to the provisions of the Model Regulations to which excepted packages are subject. The Sub-Committee accepted this recommendation, with some text in square brackets pending formal approval for the 2009 version of IAEA TS-R-1. The amendment to section 1.5.1.5 is shown on page 21 of Annex 1 to the report of the thirty-second session (ST/SG/AC.10/C.3/64).

¹ In accordance with the programme of work of the Sub-Committee for 2007-2008 approved by the Committee at its third session (refer to ST/SG/AC.10/C.3/60, para. 100 and ST/SG/AC.10/34, para. 14).

3. While the change to section 1.5.1.5 proposed by the IAEA Consultants, and adopted by the Sub-Committee, is clearer than the existing text of section 1.5.1.5, there are still a large number of cross-references, the requirement of at least one of which is revised by a subsequent cross-reference. This makes the application of the requirements somewhat confusing for users of the Regulations.

4. As there are relatively few provisions of the Model Regulations that have to be applied to excepted packages it is suggested that it may be more clear, and far simpler, to create a subsection within Part 5 to specify just what requirements apply to excepted packages.

Proposal 1

5. Add a new section 5.1.5.4 as follows:

5.1.5.4 Specific provisions for excepted packages

5.1.5.4.1 Excepted packages shall be legibly and durably marked on the outside of the packaging with:

- (a) The UN number preceded by the letters “UN”;
- (b) An identification of either the consignor or consignee, or both; and
- (c) The permissible gross weight if this exceeds 50 kg.

5.1.5.4.2 The documentation requirements of Chapter 5.4 do not apply to excepted packages of radioactive materials, except that the UN number preceded by the letters “UN” shall be shown on a transport document such as a bill of lading, air waybill or other similar document.

Proposal 2

6. Revise section 1.5.1.5 of the UN Model Regulations as follows:

1.5.1.5 Specific provisions for the transport of excepted packages

1.5.1.5.1 Excepted packages which may contain radioactive material in limited quantities, instruments, manufactured articles and empty packagings as specified in 2.7.2.4.1 shall be subject only to the following provisions of Parts 5 to 7:

- a) The applicable provisions specified in 5.1.2, 5.1.3.2, 5.1.4, ~~5.1.5.4, 5.2.1.1, 5.2.1.2, 5.2.1.5.1 to 5.2.1.5.3~~, 5.2.1.7, ~~5.4.1.4.1(a)~~, [7.1.8.5.3 to 7.1.8.6.1, 7.1.8.5.1] and 7.1.8.5.2;

Proposal 3

7. If the previous proposals are adopted there will be a requirement for a consequential amendment to 5.2.1.5 as follows:

5.2.1.5 *Special marking provisions for Class 7*

5.2.1.5.1 Each package shall be legibly and durably marked on the outside of the packaging with an identification of either the consignor or consignee, or both.