

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 7 of the provisional agenda

Cooperation with the International Atomic Energy Agency

Comments on ST/SG/AC.10/C.3/2012/58

Transmitted by the International Atomic Energy Agency

Background

1. The IAEA Secretariat has reviewed ST/SG/AC.10/C.3/2012/58. Some minor editorial issues have been passed informally, however the IAEA Secretariat wishes to request clarification on some issues, and proposes further work as a result of others.

2.7.2.1.1 In the IAEA regulation, para 401 directly refers to not only classification of package but also characterization of material.

2. Therefore, the IAEA Secretariat proposes to add a sentence into 2.7.2.1.1 to make clear this point.

3. Amend 2.7.2.1.1 to read:

“Radioactive material shall be assigned to one of the UN numbers specified in Table 2.7.2.1.1, in accordance with 2.7.2.4.2 to 2.7.2.5, taking into account material characteristic determined in 2.7.2.3.”

5.1.5.2.1 Following review of 5.1.5.2.1 the IAEA Secretariat notes that it does not include the full list of certifications by competent authority required in the IAEA regulation. For example, 802(d) (RPP for special use vessels) and 802(e) (basic radionuclides values) correspond to 7.2.3.2.2 and 2.7.2.2.2, respectively, but the requirement for certification by the competent authority seems missing. Moreover, it is noted that “certification by competent authority for alternative activity limits” is not included at this time in any location.

The UN Secretariat has noted to IAEA in the past that certification creates an interface problem between IAEA and UNOB. As a result the IAEA Secretariat proposes an intercessional working group to review the most effective way to achieve harmonisation, with the mandate of producing a proposal for the November/December meetings – with a view to proposed text change being introduced in the next biennium. In addition the intercessional working group should be mandated to introduce text related to “certification by competent authority for alternative activity limits”.

5.1.5.4.3 The IAEA Secretariat could not find the source in IAEA text and seeks clarification of the related IAEA paragraph, noting that the TABLE OF CORRESPONDENCE should be also changed.

Note by the UN secretariat

5.1.5.2.1: In fact, the requirements for multilateral approval of basic radioactive values and activity limits may be found in 2.7.2.2.2 (a) and (b). It is true that this is not repeated in 5.1.5.2.1 (except that we have included the one relating to alternative activity limits in 5.1.5.2.1 (c), but the question is whether this should be in 5.1.5.2 which deals with multilateral approval of shipments or in 5.1.5.2.1. The certificates for multilateral approval of shipments are covered by 5.1.5.2.1 (d) which refers to 5.1.5.1.2 ("certain shipments (see 5.1.5.1.2)").

So the reference to multilateral approval of basic radionuclides values and alternative activity limits could perhaps be included in 5.1.5.1.2 rather than 5.1.5.2.1 (in which case 5.1.5.2.1 (c) could be deleted).

In this respect, you may also wish to note that the certificate for RPP for special use vessel is covered by the combination of 5.1.5.2.1 (d) and 5.1.5.1.2 (d).

5.1.5.4.3: Section 5.1.5.4 is intended to summarize all consignment procedures for shipment of excepted packages to facilitate checking by operators. As para 5.2.1.5.8 (IAEA 530) and 5.2.2.1.12.5 (IAEA 530) do not apply to all shipments of excepted packages, it was felt that these provisions should not be reproduced in 5.1.5.4, but that a reminder should be included for the cases when they apply. The question is whether 5.1.3.5 (categorization) and 5.4.1.5.7.3 (documentation) should be listed as well.

In short, the reason why 5.1.5.4.3 exists is because IAEA para 530 is referred to in 515 (a). Possibly only the first sentence of para 530 applies, so this reference in the IAEA Regulations should be checked, i.e. to what extent, the second sentence of para 530 would be likely to apply in the case of excepted packages. If it is relevant to apply this second sentence, then the correspondence for 5.1.5.4.3 in the IAEA Regulations is para 530.
