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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****Forty-fourth session**

Geneva, 25 November – 4 December 2013

Item 7 of the provisional agenda

**Cooperation with the International Atomic Energy Agency****Requirements and controls for transport of radioactive  
excepted packages****Submitted by the expert from Spain<sup>1</sup>****Introduction**

1. IAEA Safety Standards n° SSR-6 “Regulations for the Safe Transport of Radioactive Material” (2012 Edition) establishes:

**Paragraph 515 of Section V**

Excepted packages shall be subject **only** to the following provisions in **Section V and VI**:

- (a) The requirements specified in paragraphs 503-505, 507-513, 516, 530-533, 545, 546 introductory sentence, 546 (a), 546 (k), 550-553, 555, 556, 561, 564, 582 and 583;
- (b) The requirements for excepted packages specified in paragraph 622;
- (c) The requirements specified in paragraphs 580 and 581, if transported by post.

All relevant provisions of the other sections shall apply to excepted packages. If the excepted package contains fissile material, one of the fissile exceptions provided by paragraph 417 shall apply.

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<sup>1</sup> In accordance with the programme of work of the Sub-Committee for 2013–2014 approved by the Committee at its sixth session (see ST/SG/AC.10/C.3/84, para. 86 and ST/SG/AC.10/40, para. 14).

### **Paragraph 801 of Section VIII**

For package designs where it is not required that a competent authority issue a certificate of approval, the consignor shall, on request, make available for inspection by the relevant competent authority, documentary evidence of the compliance of the package design with all the applicable requirements

#### **Therefore paragraph 801 applies to excepted packages**

2. The transcription of paragraphs 515 and 801 to the Eighteenth revised edition of the Recommendations on the Transport of Dangerous Goods, Model Regulations, is as follows:

#### **Paragraph 1.5.1.5 of Part 1 Specific provisions for 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 5.1.1.2, 5.1.3.2, 5.1.5.2.2, 5.1.5.4, 5.2.1.7, 7.1.8.3.1, 7.1.8.5.1 to 7.1.8.5.4 and 7.1.8.6.1; and
- (b) The requirements for excepted packages specified in 6.4.4

except when the radioactive material possesses other hazardous properties and has to be classified in a class other than Class 7 in accordance with special provision 290 or 369 of Chapter 3.3, where the provisions listed in (a) and (b) above apply only as relevant and in addition to those relating to the main class or division.

1.5.1.5.2 Excepted packages shall be subject to the relevant provisions of all other parts of these Regulations. If the excepted package contains fissile material, one of the fissile exceptions provided by 2.7.2.3.5 shall apply and the requirements of 7.1.8.4.3 shall be met.

#### **Paragraph 5.1.5.2.3 of Part 5**

For package designs where it is not required that a competent authority issue a certificate of approval, the consignor shall, on request, make available for inspection by the relevant competent authority, documentary evidence of the compliance of the package design with all the applicable requirements.

**Therefore according to what is established in 1.5.1.5.1, paragraph 5.1.5.2.3 would not apply to excepted packages. However, the requirement defined in 5.1.5.2.3 (paragraph 801 in SSR-6) should also apply to excepted packages.**

## **Proposal**

3. Amend Sub-paragraph 1.5.1.5.1 as follows:

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 5.1.1.2, 5.1.3.2, 5.1.5.2.2, 5.1.5.2.3, 5.1.5.4, 5.2.1.7, 7.1.8.3.1, 7.1.8.5.1 to 7.1.8.5.4 and 7.1.8.6.1; and
- (b) The requirements for excepted packages specified in 6.4.4

except when the radioactive material possesses other hazardous properties and has to be classified in a class other than Class 7 in accordance with special provision 290 or 369 of Chapter 3.3, where the provisions listed in (a) and (b) above apply only as relevant and in addition to those relating to the main class or division.