



**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****Fifty-sixth session**

Geneva, 2-11 December 2019

Item 6 (e) of the provisional agenda

Miscellaneous proposals for amendments to the Model**Regulations on the Transport of Dangerous Goods:****other miscellaneous proposals****Transport by post of Class 7 excepted packages with limited
activity****Transmitted by the expert from Switzerland****Summary*

Executive summary: The IAEA Transport Regulations as well as the Model Regulations and subsequent agreements for the transport modes implement facilitated requirements for the transport of Class 7 excepted packages by post such as the reduced activity limit of one tenth of that permitted in the table 2.7.2.4.1.2 of the UN Model Regulations. To enable continuous transport by post of these packages, the existing provisions in the UPU Convention are proposed for introduction into the Model Regulations. The facilitations for transport by post are provided according to the UPU Convention.

Action to be taken: New special provision Chapter 3.3

Reference documents: International Bureau of the Universal Postal Union: UPU Convention Manual. Berne, 2018

Introduction

1. Paragraph 580 of the Regulations for the Safe Transport of Radioactive Material (SSR-6) of the International Atomic Energy Agency (IAEA) addresses particularly transport by post:

“A *consignment* that conforms to the requirements of para. 515, in which the activity of the *radioactive contents* does not exceed one tenth of the limits prescribed in

* In accordance with the programme of work of the Sub-Committee for 2019-2020 approved by the Committee at its ninth session (see ST/SG/AC.10/C.3/108, paragraph 141 and ST/SG/AC.10/46, paragraph 14).

Table 4, and that does not contain uranium hexafluoride, may be accepted for domestic movement by national postal authorities, subject to such additional requirements as those authorities may prescribe.”

2. The paragraph refers to the provisions for excepted packages (paragraph 515) and table 4 which was introduced as 2.7.2.4.1.2 in the Model Regulations. The paragraph is still present in the 2018 edition of the IAEA Transport Regulations without changes.

3. The Model Regulations recall this provision in paragraph 1.1.1.6 (b): The second sentence of this paragraph states the following:

“Radioactive material in an excepted package conforming to the requirements of 1.5.1.5, the activity of which does not exceed one tenth of that listed in Table 2.7.2.4.1.2 and that does not meet the definitions and criteria of classes, other than Class 7, or divisions, as defined in Part 2.”

4. The air mode has implemented this provision as paragraph 2.3.2 (c) of the ICAO Technical Instructions:

2.3 TRANSPORT OF DANGEROUS GOODS BY POST

2.3.2 *The following dangerous goods may be acceptable in mail for air carriage subject to the provisions of the appropriate national authorities concerned and these Instructions:*

c) *radioactive material in an excepted package, UN Nos. 2910 and 2911 only, the activity of which does not exceed one-tenth of that listed in Part 2, Chapter 7, Table 2-14, and that does not meet the definitions and criteria of classes, other than Class 7, or divisions, as defined in Part 2. The package must be marked with the name of the shipper and the consignee, the package must be marked “radioactive material - quantities permitted for movement by post” and must bear the radioactive material, excepted package label (Figure 5-33);*

Note 1.- Designated postal operators may accept the dangerous goods identified in 2.3.2 a), b) and c) without receiving specific approval from the civil aviation authority.

5. The UPU Convention has introduced this provision for the post mode in article 19-006:

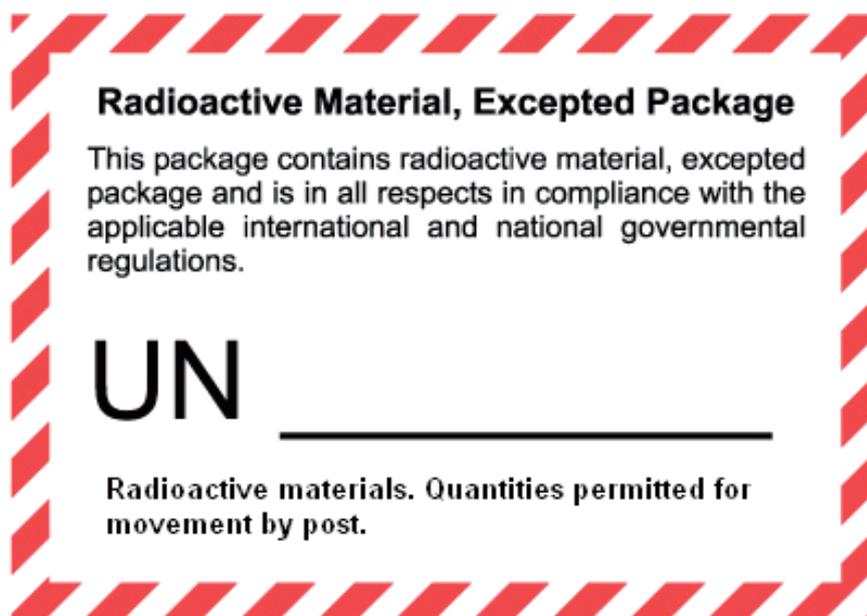
1. *Items containing radioactive materials, whose contents and make-up comply with the regulations of the International Atomic Energy Agency shall be admitted for conveyance by post subject to prior consent from the competent authorities of the country of origin provided the activity does not exceed one tenth of that permitted in Table 3 – Activity Limits for Excepted Packages as listed in the current edition of the IAEA TS-R-1 and does not contain uranium hexafluoride.*

2 *The outside packaging of items containing radioactive materials shall be marked by the sender with the label shown below indicating the applicable UN-number. It shall also bear, in addition to the name and address of the sender, a request in bold letters for the return of the items in the event of non-delivery.*

3 *The sender shall give his name and address and the contents of the item on the inner wrapping.*

4 *The label shown above shall be clearly crossed out, should the empty package be returned to the place of origin.*

6. The label mentioned in paragraph 4 above is shown hereafter. This label allows the distinction of excepted packages respecting regular activity limits and those respecting the reduced activity limits permitted for transport by post:



Concerning safety aspects, the following comment has been added to article 19-006:

Commentary

1 As understood here, the conveyance by post of radioactive materials is restricted to consignments exempted from special conveyance prescriptions, within the meaning of the IAEA Regs for the safe transport of radioactive materials, because of the very low activity of their contents.

7. The provisions for transport of excepted packages by post have been introduced in the Model Regulations and the ICAO Technical Instructions, but they are not fully introduced in the land and sea mode regulations. Even, the provisions in the dangerous goods regulatory framework are not fully harmonised with the provisions of the UPU Convention. To enable multimodal transport of excepted packages by post, in particular by air, road and rail, a special provision is presented based on the existing article 19-006 of the UPU Convention. This proposal benefits from the comment made in this article permitting facilitation for the transport by post justified by the IAEA Regulations.

Proposal

8. Insert the following new special provision XYZ in Chapter 3.3 of the Model Regulations. The special provision should be assigned to UN 2910 and UN 2911:

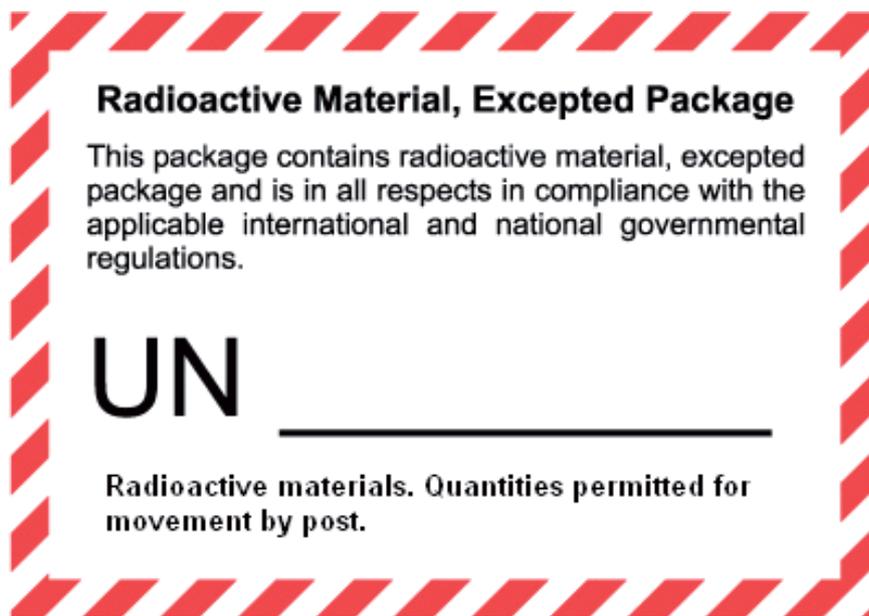
“XYZ Radioactive material in an excepted package that does not meet the definitions and criteria of classes, other than Class 7, or divisions, as defined in Part 2 offered for transport are not subject to the provisions of 5.1.5.4 and 7.1.8.6.1, if they meet the following:

(a) Items containing radioactive materials, whose contents and make-up comply with the regulations of the International Atomic Energy Agency shall be admitted for conveyance by post subject to prior consent from the competent authorities of the country of origin provided the activity does not exceed one tenth of that permitted in Table 2.7.2.4.1.2 of these Regulations and does not contain uranium hexafluoride.

(b) The outside packaging of items containing radioactive materials shall be marked by the sender with the label shown below indicating the applicable UN-number. It shall also bear, in addition to the name and address of the sender, a request in bold letters for the return of the items in the event of non-delivery.

(c) The sender shall give his name and address and the contents of the item on the inner wrapping.

- (d) The label shown below shall be clearly crossed out, should the empty package be returned to the place of origin.



NOTE: As understood here, the conveyance by post of radioactive materials is restricted to consignments exempted from special conveyance prescriptions, within the meaning of the IAEA Regulations for the safe transport of radioactive material, because of the very low activity of their contents.”

Justification

9. Due to a reduced activity limit of one tenth for excepted packages of Class 7, facilitated requirements for transport have been proposed and are justified by the comment in the UPU Convention referencing the IAEA Regulations.

10. The proposal supports a continuous, multimodal transport of Class 7 excepted packages with a reduced activity limit of one tenth of that provided by the Table 2.7.2.4.1.2 as originally intended by implementing paragraph 580 of the IAEA Transport Regulations in the Model Regulations and the subsequent agreements for the various transport modes.
