
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

Twenty-sixth session
Geneva, 29 November-7 December 2004
Item 4 of the agenda

NEW PROPOSALS OF AMENDMENT TO THE RECOMMENDATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Security

Note by the secretariat

Limited quantities/radioactive material in excepted packages

1. According to 3.4.1, all provisions and requirements of the Regulations apply to the transport of limited quantities except as specifically provided in Chapter 3.4. Since there is no provision in Chapter 3.4 exempting limited quantities from the provisions of Chapter 1.4, it implies that transport of limited quantities, including of those referred to in 3.4.9, is subject to the security provisions of Chapter 1.4 and section 7.2.4.
2. Similarly, for radioactive material in excepted packages, there is no reference to Chapter 1.4 in paragraph 2.7.9.7, therefore their transport is also subject to the provisions of Chapter 1.4 and section 7.2.4.
3. It is not clear to the secretariat whether or not the Sub-Committee intended to require the application of general security provisions to the transport of limited quantities and radioactive material in excepted packages or whether this was an oversight. Nevertheless, when the Chapter 1.4 provisions were considered by the UNECE Working Party on the Transport of Dangerous Goods and the RID/ADR/ADN Joint Meeting, it was decided that the carriage of limited quantities and radioactive material in excepted packages should be excluded from the scope of the security provisions.
4. If the Sub-Committee did not intend to apply the security provisions to limited quantities and to Class 7 excepted packages, the secretariat proposes the following changes:

Paragraph 3.4.1:

Insert a new sentence before the last sentence to read as follows:

“The provisions of Chapter 1.4 and section 7.2.4 do not apply to the transport of dangerous goods packed in limited quantities.”

Amend the beginning of the last sentence to read:

“All other provisions and requirements....”

Paragraph 2.7.9.7:

Insert “Chapter 1.4” and “section 7.2.4” in the list of provisions which do not apply.

Application of Chapter 1.4 to nuclear material

During the session of a Technical Meeting for the review of the IAEA Regulations for the Safe Transport of Radioactive Material which took place in Vienna from 27 September to 1 October 2004, it was mentioned that NOTE 2 to table 1.4.1 causes problems of interpretation when introduced as such in legislation, as it does not make clear whether the provisions of Chapter 1.4 have to be applied or replace the provisions of the Convention on Physical Protection of Nuclear Material. In order to solve this problem, the secretariat proposes the following amendments:

Chapter 1.4:

- (1) Delete NOTE 2 and delete “1” in “NOTE 1”.
 - (2) Add a new paragraph 1.4.5.2.2 after Table 1.4.1 to read as follows:
“1.4.5.2.2 For radioactive material, the provisions of this Chapter and of section 7.2.4 are deemed to be complied with when the provisions of the Convention on Physical Protection of Nuclear Material and of IAEA INFCIRC/225 (Rev.4) are applied”.
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