RID/ADR 1.1.3.1 and Radioactive Material

Transmitted by the Government of the United Kingdom

Introduction

1. The United Kingdom has received queries from industry regarding the application of RID/ADR 1.1.3.1 to Class 7 dangerous goods due to the presence of the following note in 1.1.3.1:

   "NOTE: For radioactive material, see 1.7.1.4."

2. The exemptions of 1.1.3.1(c) and 1.1.3.1(f) are clear that they do not apply to Class 7 as they are specifically excluded. The note has led to confusion among industry as to whether the other exemptions of 1.1.3.1 can apply to Class 7 in addition to those presented in 1.7.1.4. The same note can also be found in 1.1.3.4.

3. The United Kingdom is of the opinion that the provisions of 1.1.3.1 (a), (b), (d) and (e) together with 1.1.3.4 do apply to Class 7 dangerous goods and that the specific Class 7 exemptions given in 1.7.1.4 are in addition to the exemptions contained in 1.1.3.1 and 1.1.3.4. The United Kingdom believes that a simple amendment to the notes would add clarity to these texts.

Proposal

4. Amend the notes in 1.1.3.1 and 1.1.3.4 to read as follows (new text is underlined):

   "NOTE: For radioactive material, see also 1.7.1.4."

Justification

5. The proposed amendment will provide clarity for the interpretation of the texts contained within 1.1.3.1 and 1.1.3.4.