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## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

100th session

Geneva, 9-13 May 2016

Item 4 of the provisional agenda

Interpretation of ADR

2 May 2016

### S21: Supervision of vehicles (Class 7)

#### Transmitted by the Government of Finland

1. Additional requirement S21 has been assigned to all entries of Class 7.
2. S21 of Chapter 8.5 reads:

The provisions of Chapter 8.4 concerning the supervision of vehicles shall apply to all material, in whatever mass. In addition, these goods shall be subject at all times to supervision to prevent any malicious act and to alert the driver and the competent authorities in the event of loss or fire. However, the provisions of Chapter 8.4 need not be applied where:

  - (a) The loaded compartment is locked or the packages carried are otherwise protected against illicit unloading; and
  - (b) The dose rate does not exceed 5 µSv/h at any accessible point on the outer surface of the vehicle.
3. S21 has been in the ADR for long time. It has not been amended even when the security provisions (Chapter 1.10) were introduced.
4. The last sentence of S21 gives opportunity not to apply the provisions of Chapter 8.4 (supervision of vehicles). Radiation and Nuclear Safety Authority in Finland has raised concern about the issue regarding security on transport of radioactive material.
5. According to IAEA statistics<sup>1</sup>, radioactive sources can be stolen while in transport. The fact that the vehicle is locked hasn't been an obstacle. Strengthening the parking requirements for at least some UN numbers would provide a cost effective and graded approach to address the problem.
6. The 5 µSv/h limit is not a good way to assess the radiation hazards of the source if stolen. The source itself might be very dangerous if used maliciously, even if the dose rate outside the vehicle is below 5 µSv/h.

The package might be heavily shielded or the source might not emit gamma or neutron radiation that can be detected outside the vehicle.
7. Finland would like to ask the opinion of the Working Party whether the last sentence of S21 is still valid from the security point of view or should it be deleted or amended.

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<sup>1</sup> <http://www-ns.iaea.org/downloads/security/itdb-fact-sheet.pdf>