

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

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HARMONIZATION WITH THE INTERNATIONAL ATOMIC ENERGY (IAEA) REGULATIONS FOR THE TRANSPORT OF RADIOACTIVE MATERIAL

Comments on informal document INF.43

Note by the secretariat

1. The secretariat has reviewed the comments made by the representative of IAEA (INF.43) on the proposal changes to the UN Model Regulation in ST/SG/AC.10/C.3/2008/98 and agrees with most of them except as follows in section 3 of the document (... Additional changes have been suggested”).

Paragraphs 2.7.2.4.2 and 2.7.2.4.3: The secretariat does not understand the proposed changes since the words “definition of” do not exist in the current text.

Paragraph 2.7.2.4.1.3 (b) (i): The secretariat believes that the addition of the word “or” is not necessary. If a word had to be added, it should be “and” since the exception applies to both cases (i) and (ii).

2.7.2.4.6.1 and 2.7.2.4.6.4: The proposed changes are not in conformity with the logic applied in Part 2 of the Model Regulations. These paragraphs should indicate when a package may be classified as type B(U), type B(M) or type C, therefore it is not logical to start the sentences with the words “Type B(U), type B(M), type C packages” as this would assume that they have already been classified.

Chapter 3.2 Addition of special provisions 325/326

The secretariat believes that the square brackets around UN 3323 and UN 3330 should be deleted. The secretariat notes that these special provisions are now redundant with 2.7.2.4.5, which indicates clearly that UF6 shall always be classified under Nos 2977 and 2978 as appropriate.

Should these special provisions be maintained for the sake of clarify, it should also apply to UN 2910. For the carriage of UF6 in excepted packages, refer also to ST/SG/AC.10/C.3/2008/99, paras 11 to 17 and annex.

5.1.5.3.4 (d) and 5.1.5.3.4 (e)

For the purpose of userfriendliness, it might be more appropriate to keep the text as it is and to replace “(see 2.7.2.4.6)” at the end by “(see 2.7.2.4.6 and 5.1.5.3.5)”.
