

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Item 8 of the provisional agenda

Any other business

6 November 2020

Differences between ADR 2021 and IAEA Regulations

Transmitted by the Government of Spain

1. Spain would like to draw the attention of the different delegations on document UN/SCETDG/57/INF.30 submitted by the International Atomic Energy Agency to the Subcommittee of Experts on the Transport of Dangerous Goods.

See <https://www.unece.org/fr/trans/main/dgdb/dgsubc3/c3inf57.html>

2. In this document, the IAEA indicates some inconsistencies remain in the 21st edition of the Model Regulations that need to be corrected to reflect the 2018 edition of the IAEA Regulations for the Safe Transport of Radioactive Material.

3. The amendments proposed by IAEA to the Model Regulations, if approved by the Subcommittee, will be integrated into ADR 2023 through the usual harmonization process.

4. Nevertheless, in ADR 2021 the present text of ADR reflects the 21st edition of the Model Regulations, and therefore does not include the proposed amendments. This may lead to difficulties in the application of the regulations, since the corrections proposed in UN/SCETDG/57/INF.30 are related to one of the most important changes made in the 2018 edition of IAEA Regulations: the elimination of the leakage test for low specific activity radioactive material LSA-III.

5. As 2.2.7.2.3.1.4 has not been deleted, this test is still required by ADR 2021, which is inconsistent with the present edition (2018) of IAEA Transport Regulations. Therefore, Spain would like to show its concern about how this inconsistency may affect the transport activities and, in particular, draw the attention of the different experts on class 7 on this issue in order to try to find a solution.
