

## **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**

**24 November 2011**

### **Fortieth session**

Geneva, 28 November – 7 December 2011

Item 6 of the provisional agenda

**Cooperation with the International Atomic Energy Agency (IAEA)**

## **Special Provision 172**

**Transmitted by the International Air Transport Association (IATA)**

### **Introduction**

1. Special Provision 172 is assigned against the entries for radioactive materials other than the entries for radioactive materials excepted package and the two entries for radioactive material, uranium hexafluoride. The special provision addresses radioactive materials with a subsidiary risk and identifies that additional hazard labels, placards must be applied and also that additional information relating to the subsidiary risk must be provided on the dangerous goods transport document.
2. The wording of Special Provision 172 with respect to the additional information required on the document and the placement of this information creates confusion for shippers and carriers as the placement of the information is not consistent with that normally required for the sequence of the dangerous goods description set out in 5.4.1.4.1(a) to (d).
3. In researching this paper it was identified that the wording of Special Provision 172 predates the mandatory application of the subsidiary hazard class or division, when assigned, to be added to the dangerous goods transport document in parenthesis immediately following the primary hazard class.
4. The Subcommittee is invited to consider if the wording of Special Provision 172 should be revised to make the provision of the information relating to the subsidiary risk class or division and packing group, when applicable, consistent with the basic sequence of the dangerous goods description set out in 5.4.1.4.1(a) to (d).
5. The subcommittee is also invited to consider if the name of the constituents which contribute to the subsidiary risk should be required to be associated with the proper shipping name of the radioactive material as would apply to a technical name where Special Provision 274 is assigned. Placement of the additional information associated with the subsidiary risk could then be included as part of the marking of the proper shipping name on the package, which may help to assist with hazard communication in the event of an incident.

## Proposal

6 Revise Special Provision 172 as follows:

172 Radioactive material with a subsidiary risk shall be treated as follows:

- (a) packages shall in addition be labelled with subsidiary risk labels corresponding to each subsidiary risk exhibited by the material; corresponding placards shall be affixed to transport units in accordance with the relevant provisions of 5.3.1;
- (b) be allocated to packing groups I, II or III, as and if appropriate, by application of the grouping criteria provided in Part 2 corresponding to the nature of the predominant subsidiary risk;
- (c) the proper shipping name described on the dangerous goods transport document and as marked on the package shall be supplemented with the name of the constituents which most predominantly contribute to this (these) subsidiary risk(s) and must be enclosed in parenthesis;
- (d) the dangerous goods transport document shall indicate the subsidiary class or division and, where assigned the packing group as required by 5.4.1.4.1(d) and (e)

~~The description required in 5.4.1.5.7.1 (b) shall include a description of these subsidiary risks (e.g. "Subsidiary risk: 3, 6.1"), the name of the constituents which most predominantly contribute to this (these) subsidiary risk(s), and where applicable, the packing group. For packing, see also 4.1.9.1.5.~~

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