

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Item 5 (b) of the provisional agenda:

**Proposals for amendments to annexes A and B of ADR:
miscellaneous proposals**

Transport Class 7 excepted packages with limited activity levels without fire-fighting equipment to enable continuous post services

Transmitted by the Government of Switzerland

Summary

Executive summary: The IAEA Transport Regulations as well as the UN Model Regulations and subsequent agreements for the transport modes implement facilitated requirements for the transport of Class 7 excepted packages by post such as the reduced activity limit of one tenth of that permitted in the table 2.2.7.2.4.1.2 of the ADR. The continuous transport by post is no longer ensured due to the fact that the fire-fighting equipment required by 1.1.3.6.2 of the ADR is not available on a lot of vehicles commonly used by post services.

Action to be taken: Amendment of Special provision S5 in Chapter 8.5

Introduction

1. The IAEA Transport Regulations SSR-6 provides paragraph 580 particularly for the transport by post:

“A *consignment* that conforms to the requirements of paragraph 515, in which the activity of the *radioactive contents* does not exceed one tenth of the limits prescribed in Table 4, and that does not contain uranium hexafluoride, may be accepted for domestic movement by national postal authorities, subject to such additional requirements as those authorities may prescribe.”.

The paragraph refers to the provisions for excepted packages (paragraph 515) and the table 4 which was introduced as the 2.2.7.2.4.1.2 in the ADR. The paragraph is still present in the 2018 edition of the IAEA Transport Regulations without changes.

2. The UN Model Regulations recall this provision in paragraph 1.1.1.6 (b): The second sentence of this paragraph states the following:

“Radioactive material in an excepted package conforming to the requirements of 1.5.1.5, the activity of which does not exceed one tenth of that listed in Table 2.7.2.4.1.2 and that does

not meet the definitions and criteria of classes, other than Class 7, or divisions, as defined in Part 2.”

3. The air mode has implemented this provision as paragraph 2.4.2 (c) of the IATA-DGR:

“Radioactive material, provided that the activity does not exceed one tenth of that permitted in Table 10.3.D. The provisions relating to documentation (Subsection 10.8) do not apply to such radioactive material.”

4. The above mentioned provisions are introduced to enable the transport of excepted packages by post. With respect to the road mode (ADR), the continuous transport of excepted packages by post is not possible due to the fire-fighting equipment required by paragraph 1.1.3.6.2 of the ADR commonly. Multiple vehicles are not equipped with a 2 kg fire extinguisher (see examples in the annex). Therefore, post services for the road mode are not offered at all for Class 7 excepted packages.

5. Other dangerous goods providing a significant higher risk such as Class 3 material in limited quantities (up to 8 tons) can be transported by post without specific fire-fighting equipment requirements.

6. In order to align the ADR with other modes and with the UN Model Regulation we present the following proposal:

Proposal

7. The underlined text in bold letters should be added to special provision S5 of chapter 8.5:

“S5: Special provisions common to the carriage of radioactive material of Class 7 in excepted packages (UN Nos. 2908, 2909, 2910 and 2911) only

The requirements of the instructions in writing of 8.1.2.1 (b) and of 8.2.1, 8.3.1 and 8.3.4 shall not apply. **The requirements for fire-fighting equipment of 8.1.4.2 to 8.1.4.5 shall not apply to dangerous goods containing radioactive material in an excepted package with an activity which does not exceed one tenth of that listed in Table 2.2.7.2.4.1.2 and that does not meet the definitions and criteria of classes, other than Class 7, or divisions, as defined in Part 2.”**

Justification

8. Due to a reduced activity limit of one tenth for excepted packages of Class 7, the fire-fighting equipment is not necessary from the safety point of view.

9. The proposal supports a continuous multi-modal transport of Class 7 excepted packages with a reduced activity limit of one tenth of that provided by the Table 2.2.7.2.4.1.2, as originally intended by implementing paragraph 580 of the IAEA Transport Regulations in the Model Regulations and the subsequent agreements for the various transport modes including ADR.

Annex

