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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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Item 7 of the provisional agenda
Global harmonization of transport of dangerous goods regulations with the Model Regulations

Information on recommendations made by the ICAO Dangerous Goods Panel

Transmitted by the International Civil Aviation Organization (ICAO)*

Introduction

1. A Dangerous Goods Panel (DGP) working group meeting was held in Montreal from 1 to 5 April 2019 (DGP-WG/19). The working group reviewed amendments proposed to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) (Technical Instructions) in order to harmonize with the 21st revised edition of the Model Regulations. The twenty-seventh meeting of the Dangerous Goods Panel (DGP/27) will meet from 16 to 20 September 2019 to finalize the amendments.

2. This document highlights issues which DGP-WG/19 determined should be brought to the attention of the Sub-Committee.

References to provisions for which transport of excepted packages of radioactive material apply

3. The list of references in Part 1; paragraph 6.1.5.1 of the Technical Instructions to provisions for which transport of excepted packages of radioactive material would apply was

* In accordance with the programme of work of the Sub-Committee for 2019–2020 approved by the Committee at its ninth session (see ST/SG/AC.10/C.3/108, paragraph 141 and ST/SG/AC.10/46, paragraph 14).

updated to align with revisions to the list contained in 1.5.1.5.1 a) of the Model Regulations. However, DGP-WG/19 considered some of the additions to be illogical and has placed them in square brackets pending further review, i.e.:

(a) paragraphs 5.4.1.5.7.1 (f) (i) and (ii), 5.4.1.5.7.1 (i) of the Model Regulations refer to transport document requirements, which are not required for radioactive material, excepted packages; and

(b) paragraph 7.1.8.4.3 of the Model Regulations refers to special provisions applicable to the carriage of fissile material in accordance with transport operations, which would be impossible for the airline operator to verify without an acceptance check.

4. A separate comment in relation to the list was that listing them, rather than referring to the exact provision, made reading the text and understanding the intent complicated. Restructuring the list into a table and including a general description of each provision referenced would simplify matters.

UN 2908 - Radioactive material, excepted package - empty packaging

5. References to the provisions of fissile excepted for what is to be classified as UN 2908 - **Radioactive material, excepted package - empty packaging** were added as a new 2.7.2.4.1.7 (e) in the UN Model Regulations, i.e.:

"2.7.2.4.1.7 An empty packaging which had previously contained radioactive material may be classified under UN 2908 RADIOACTIVE MATERIAL, EXCEPTED PACKAGE - EMPTY PACKAGING, provided that:

…

(e) If the packaging has contained fissile material, one of the provisions of 2.7.2.3.5 (a) to (f) or one of the provisions for exclusion in 2.7.1.3 shall apply."

6. DGP-WG/19 questioned whether it was appropriate to include references to these provisions, since by definition an empty packaging could not meet most of the conditions, as they applied to fissile excepted nuclides in a packaging, and therefore the packaging is not empty. The references were therefore placed in square brackets pending further consideration.

7. As a separate issue relating to new sub-paragraph (e), DGP-WG/19 modified the text to refer specifically to the definition for fissile nuclides instead of a general reference to the definitions of specific terms in paragraph 2.7.1.3 of the Model Regulations (Part 2; 7.1.3 of the Technical Instructions), i.e. for the Technical Instructions:

"(e) if the packaging has contained fissile material, one of the provisions of [7.2.3.5.1 a) to f)] or one of the provisions for exclusion for fissile nuclides as described in 7.1.3 must apply.".

Special provision 388

8. The amendment to special provision 388 of the Model Regulations refers to the full name assigned to UN 366 (LITHIUM BATTERIES INSTALLED IN CARGO TRANSPORT UNIT lithium ion batteries or lithium metal batteries). DGP-WG/19 decided not to include the text that is not part of the proper shipping name in corresponding Special Provision A214 of the Technical Instructions as it was considered redundant.

Criteria for determining the transport index for overpacks or freight containers

9. DGP-WG/19 considered revisions to the criteria for determining the transport index for overpacks or freight containers to be unclear (5.1.5.3.2 of the Model Regulations Part 5; 1.2.3.1.2 of the Technical Instructions), i.e., from the Model Regulations:

> 5.1.5.3.2 Amend to read as follows:
>
> "The TI for each rigid overpack, freight container or conveyance shall be determined as the sum of the TIs of all the packages contained therein. For a shipment from a single consignor, the consignor may determine the TI by direct measurement of dose rate.
>
> The TI for a non-rigid overpack shall be determined only as the sum of the TIs of all the packages within the overpack.".

10. The revised text refers specifically to a shipment from a single shipper, despite the fact that overpacks can only be offered from a single shipper. DGP-WG/19 considered the new sentence added for non-rigid overpacks to be unnecessary, as the requirement is the same for rigid overpacks.

Marking requirements for radioactive material

11. New marking requirements for radioactive material added to 5.2.1.5.6 of the Model Regulations incorrectly refer to the UN number and proper shipping name assigned to a *consignment*, i.e.:

> "Any mark on the package made in accordance with the requirements of 5.2.1.5.4 (a) and (b) and 5.2.1.5.5 (c) relating to the package type that does not relate to the UN number and proper shipping name assigned to the *consignment* shall be removed or covered."

New provisions for more than one mark to appear on a package

12. Editorial revisions to new provisions for more than one mark to appear on a package when a packaging conforms to more than one tested packaging design type in 6.1.3.13 of the Model Regulations were made to the associated provisions in the Technical Instructions (Part 6; 2.1.15), i.e.:

> "Where a packaging conforms to more than one tested packaging design type, the packaging may bear more than one mark to indicate the relevant performance test requirements that have been met. The marks must appear in close proximity to one another and each mark must appear in its entirety."

Conclusion

13. The DGP Secretary was requested to raise the above issues to the Sub-Committee and to consider whether these amendments to Model Regulations should be considered. A working paper will be submitted to the next session of the Sub-Committee to address the issues raised if considered necessary.