



WORKING PAPER

DANGEROUS GOODS PANEL (DGP)

TWENTIETH MEETING

Montréal, 24 October to 04 November 2005

Agenda Item 2: Development of recommendations for amendments to the Technical Instructions for the Safe Transport of Dangerous Goods by Air (Doc 9284) for incorporation in the 2007-2008 Edition

**EXCEPTED PACKAGES OF RADIOACTIVE MATERIAL HAVING
OTHER HAZARDOUS PROPERTIES IN QUANTITIES FALLING
UNDER THE PROVISIONS FOR DANGEROUS GOODS IN
EXCEPTED QUANTITIES**

(Presented by K. Vermeersch)

1. INTRODUCTION

1.1 Part 2; Introductory chapter, paragraph 4.2 specifies that in case of radioactive material in excepted packages having other hazardous properties, the other hazardous properties take precedence. This means the package must be in full compliance with all the requirements for the other hazard class. (Packing, testing of packages, marking, labelling and documentation, etc.)

1.2 Very often, however, the quantities of dangerous goods offered meet also the provisions of dangerous goods in excepted quantities. In accordance with the provisions of Part 1; 2.4 substances in classes, divisions and packing groups meeting the provisions of excepted quantities may also be radioactive material in excepted packages under condition the package also complies with the requirements for excepted packages of radioactive material.

1.3 Although the preparation of the package itself does not create any particular problem for the shippers, the marking requirements of these packages are not very clear and cause very often confusion. Some shippers mark the packages only with the specific marking requirements for 'Excepted Quantities' (i.e. the words "Dangerous Goods in Excepted quantities" often replaced by the specific IATA Excepted Quantities label). This creates not only problems for these countries with special licensing requirements for radioactive packages in excepted quantities but means also a loss of information for emergency services and intervention teams. Others only mark the packages in accordance with the provisions for radioactive material in excepted packages and the last category of shippers marks the packages in accordance with both sets of requirements.

1.4 The IAEA regulations for the safe transport of Radioactive material (ST-1) require that in addition to the labelling and marking requirements for excepted packages of radioactive material, these packages must be “labelled” as required by the relevant regulations.

2. PROPOSAL 1

2.1 If the panel is of the opinion that the package must be marked with both the markings for excepted quantities and the markings for excepted radioactive material, the following sentence must be added to Part 1; 2.4.6.1:

2.4.6.1 Each package prepared according to these provisions must be durably and legibly marked with the words “Dangerous goods in excepted quantities” and with the name and address of the shipper. When excepted radioactive material is involved, the additional markings and labels as required in 5; 2.4.5 a) and e) and 5;3.2.11 e) must also be added. If the package is included in an overpack, these markings must be clearly visible or appear on the overpack.

3. PROPOSAL 2

3.1 If the panel is of the opinion that due to the very small amounts of other dangerous goods there is no need to overload the package with markings and labels the following is proposed:

2.4.6.1 Each package prepared according to these provisions must be durably and legibly marked with the words “Dangerous goods in excepted quantities” and with the name and address of the shipper. When excepted radioactive material is involved, the words “Dangerous Goods in excepted quantities” must be replaced the markings and labels as required in 5; 2.4.5 a) and e) and 5;3.2.11 e). If the package is included in an overpack, these markings must be clearly visible or appear on the overpack.

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