



**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****Forty-first session**

Geneva, 25 June – 4 July 2012

Item 7 of the provisional agenda

Cooperation with the International Atomic Energy Agency**Special Provision 172****Transmitted by the International Air Transport Association (IATA)¹****Introduction**

1. At the 40th session of the Sub-Committee IATA submitted an informal paper INF.40 proposing revisions to Special Provision 172, which relates to radioactive materials with a subsidiary in another class or division. The Sub-Committee noted the proposal but requested that a formal paper be submitted to this session as part of the alignment of the Model Regulations and IAEA TS-R-1.
2. Special Provision 172 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. 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.

¹ In accordance with the programme of work of the Sub-Committee for 2011-2012 approved by the Committee at its fifth session (refer to ST/SG/AC.10/C.3/76, para. 116 and ST/SG/AC.10/38, para. 16).

4. It is proposed that the wording of Special Provision 172 be revised to make the provision of the information associated with the subsidiary risk(s) consistent with the basic sequence of the dangerous goods description set out in 5.4.1.4.1(a) to (d).

5. The Sub-Committee 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. ~~Where a radioactive material with has a subsidiary risk shall:~~

- (a) Packages shall 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;~~
- (b) 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)
- [(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 shall be enclosed in parenthesis;]

~~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.~~