Agenda item 4.1.3
TRANSSC 30
Overview and update on the work performed on Freight Containers

Report from CG-Freight Containers
(Corresponding Group on Freight Containers)

Akiko Konnai
National Maritime Research Institute
Tokyo, Japan

Makoto Hirose
Nuclear Regulation Authority
Tokyo, Japan
1-1 Background

• 2012 Edition of the IAEA Transport Regulations, Para. 223: No “permanent enclosed character” required.
  - Open type container is also defined as “ Freight container” in RAM transport.

• Issues emerged by use of open type containers were pointed out in TRANSSC29, such as:
  - Definition of small/large freight container (internal volume 3 m³)
  - Determination of transport index (TI) of container
  - Requirements on labels and placards

• TRANSSC 29 recommended Japan to lead a Corresponding Group to integrate proposals to resolve freight container issues.

• “Corresponding Group on Freight Containers” was formed in December 2014, and change proposals have been drafted and submitted.
  - 9 Experts from 5 MSs, 1 IO and 1 NGO: Brazil, Canada, Germany, Japan, Russia, IMO and WNTI
Open Type Freight Containers

**Platform type:**
only the base with corner fittings at the four angles

**Flat rack type:**
platform with four corner posts, or two end frames or walls

**Open top type:**
the roof is removable

**Open-sided freight container**

**Open-top freight container**
Proposal 1 (Regulatory Change)

- Transitional arrangements for packages not requiring CA approval complying to 1996 and following Ed. of the Regulations are proposed.
  - to cope with changes in modal regulations or industrial standards

819bis. *Packages not requiring competent authority approval of design shall meet this Edition of these Regulations in full, except that packages that meet the requirements of the 1996 and following Editions of these Regulations may continue to be used provided that:*

(i) The activity limits and classification in Section IV are applied;
(ii) The requirements and controls for transport in Section V are applied;
(iii) In the case of UN Packagings, IBC’s, portable tanks and other tanks, used as IP-2 or IP-3, they conform to the UN Model regulations or Modal Regulations in force or are allowed to continue to be used by complying to transitional measures contained in those regulations;
(iv) In the case of large freight containers used as IP-2 or IP-3, they conform to the ISO 1496/1 standard which was applicable at the time of their construction, excluding dimensions and rating.
Proposal 2 (Guidance Change)

- Explanations on various kind of freight containers are added in paras 223.1 to 223.4 of SSG-26.
- Interpretation on the “internal volume” for open-sided or open-top freight containers is proposed.

“The larger of the volume of a rectangular prism encompassing the container structure or the load may be used as the internal volume.”

- It is clarified that there is no “small freight container” under CSC (then, IMDG Code, ADR and RID) or ISO standards.
Proposal 3 (Guidance Change)

For the case to determine the transport index (TI) for open-sided container through the direct measurement of the radiation level, an interpretation of the surface of such container is proposed.

The TI for a freight container may be established alternatively as the sum of the TIs of all packages in the freight container. For an open-sided or open-top freight container, surfaces of a rectangular prism encompassing the container structure and the load can be considered as the surfaces of the load, and the largest cross-sectional area of that prism is used to determine the additional multiplication factor in Table 7.
Proposal 4 (Guidance Change)

- When labels on packages are visible and legible from outside the freight container boundaries, no label on the freight container is required. Otherwise, four labels should be displayed on the freight container somehow. (labels can be replaced by placards.)

- Placards should be affixed to the freight container somehow.

* This may require regulatory text change in order to be incorporated in the modal regulations.
• To be consistent with modal regulations, dimensions of labels and placard are specified.

Labels

Placard

min. Line width: 2mm

Line width: 5mm?
Further consideration ...

- To pursue further consistency to UNOB, regulatory text change on para. 223 (definitions) may be considered.

223. *Freight container* shall mean an article of transport equipment that is of a permanent character and accordingly strong enough to be suitable for repeated use; specially designed to facilitate the transport of goods, by one or other modes of transport, without intermediate reloading, designed to be secured and/or readily handled, having fittings for these purposes, *and approved in accordance with the International Convention for Safe Containers (CSC), 1972, as amended*. The term “*freight container*” does not include the *vehicle*.

A small freight container shall mean a freight container that has an internal volume of not more than 3 m$^3$. A large freight container shall mean a freight container that has an internal volume of more than 3 m$^3$.

- This proposal eliminates “small freight container”, thus further changes in SSR-6 and SSG-26 have to be elaborated. Some of previous proposals will conflict with this proposal.
• These proposals have submitted from Japan as J/2015/16 to J/2015/31 in INF-03 “Review Cycle 2015 – Combined Comments”, and marked as [Freight Container] in the column [4].

• F/2015/15 and D/2015/10 are also related to freight containers.
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Thank you for your attention.

No Q and A time is available, but please discuss in the WG.