Participants in TRANSSC 35 Working Group 3:
Discussion on probable comments to be submitted under Member States consultation of DS-496 (December 13, 2017)

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Working Group 3 reviewed the terms of reference and clarified that the outcome of the working group was not to come-up with read-line strikeout version of DS496 but rather to discuss comments already submitted by Member States and those that will be submitted prior to the closing of the comment period.

The first list of comments reviewed was those submitted by the United States. It was noted that the vast majority of the comments submitted were editorial in nature and many relate to numbering errors noted in the review. The presentation outlined only those comments that were not editorial in nature and were for the most part related to the inclusion of SCO-III Material.

One Member State asked for clarification on the comment number USA#89 related to the labelling of SCO-III Material. Upon review, it was noted that the current text was adequate and that the comment could be deleted.

The second list of comments reviewed was those submitted by Japan. Japan suggested that text related to the history of the regulations be removed from SSG-26 and be moved to the Technical Basis document. Other comments included the rejection of the proposed text for paragraph 401.2 as well as additional text related to the inclusion of SCO-III Material; including improvement to Appendix VII.

Other Member States supported the comment from Japan to deleted paragraph 401.2. In addition, the Working Group recommended that TRANSSC discuss the format and content to be included in SSG-26 in that, it should be decided if the content should be limited to guidance on how to comply with the Regulations (SSR-6) with other information to be moved to the Technical Basis document. It was suggested that this discussion take place before the new revision cycle.

This was followed by the last lists of comments submitted by Belgium. It was noted that the main comment was related to the work of the Working Group that looked at the 20 percent increase under normal condition of transport that took place earlier in the week and that additional guidance have been developed by that Working Group for submission before the end of the comment period.

Other Member States provided an overview of the comments that they intent to submit. Canada indicated that their comments were either editorial or similar to comments already submitted. Germany provided an overview on two comments that will be submitted. The first comment was related to the insertion of a new paragraph 676.2 related to criticality safety that had been discussed and approved by all participant to the Working Group on criticality. The second comment was related to paragraph 613, where it is suggested to include more information on aging management. It was suggested to include the evaluation of the results prior to shipment as well the use of wording similar wording regarding aging management in the draft PDSR document.
Other comments also suggested to include information on how to address the aging management when a package design approved in one country and used for storage in another country.

Following the presentation, one Member State asked clarification on the wording of paragraph 520.9 included in the draft SSG-26 and related to SCO-III. After review, it was noted that the paragraph contained an error and that the comment should be submitted as part of the 120-day comment period.