ONR Transport Competent Authority Newsletter

July to December 2024

# Introduction

Welcome to the latest newsletter from our Transport Competent Authority (TCA).

The TCA is the enforcing authority and competent authority, under the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (CDG09), for the civil transport of Class 7 dangerous goods (radioactive material) by road and rail within Great Britain (GB).

The TCA also provides support to the other UK competent authorities with respect to transport by sea and air, and by land in Northern Ireland. We are also the enforcing authority for the Ionising Radiations Regulations 2017 (IRR17) with regards to civil transport.

The TCA provides generic guidance and support on how dutyholders can comply with the legal requirements via our [website](http://www.onr.org.uk/transport/index.htm) and stakeholder events.

For advice on specific transport activities, dutyholders should consult their Radiation Protection Adviser (RPA) and/or Dangerous Goods Safety Adviser (DGSA).

# Inspections and compliance activity

We undertake a programme of planned compliance inspections of dutyholders that have transport responsibilities. Inspections are undertaken in person at dutyholders’ premises, at the roadside or remotely.

During the current financial year, we have undertaken a number of transport compliance inspections of nuclear sector (e.g. site licensees) and non-nuclear sector (e.g. hospitals, universities, carriers etc.) dutyholders.

During these inspections, the following non-compliance themes were identified:

* Transport Radiation Risk Assessments (RRAs) not being suitable and sufficient.
* Inadequate management systems.
* Insufficient Emergency/Contingency Planning and Testing.

We will continue to work with transport dutyholders and other stakeholders such as industry groups and professional bodies to raise awareness of these non-compliance themes and to increase understanding of the legal duties.

Guidance relevant to transport compliance inspections is available on our [website](https://www.onr.org.uk/our-work/what-we-regulate/transport-of-radioactive-material/guidance-and-resources/).

# Contingency and Emergency Planning

There is a requirement for dutyholders with an emergency plan to test it at least every three years and provide a report on the outcome of the test to us. If you have tested your emergency plan recently, send your report to [class7@onr.gov.uk](mailto:class7@onr.gov.uk) if you haven’t already done so.

On our website there is guidance on emergency [planning for transport incidents](https://www.onr.org.uk/transport/five-steps-transport-emergency-planning.docx) and [transport radiation risk assessment](https://www.onr.org.uk/media/ndunfeng/td-tca-gd-003.docx)..

# Competent Authority Approval

Our [‘Applicants Guide'](https://www.onr.org.uk/media/rdnn01ig/tra-per-gd-014.docx) provides guidance to organisations applying to us for Competent Authority approval for new designs, renewal of existing approvals, validation of overseas approvals or modifications to approved designs.

On our website there are copies of the [regulatory reports](https://www.onr.org.uk/our-work/what-we-regulate/transport-of-radioactive-material/competent-authority-approval/certification-of-transport-packages-and-special-form-radioactive-material/) justifying competent authority decisions to grant approval, and any associated certificates of approval.

# Enforcement

Where non-compliances are identified during inspections or following reported incidents, we will consider enforcement action in accordance with our [Enforcement Policy Statement (EPS).](https://www.onr.org.uk/documents/enforcement-policy-statement.pdf)

We have recently issued improvement notices to Reviss Services (UK) Ltd, a provider of gamma radiation technology services, and Transrad SA, a radioactive and nuclear material transport carrier.

Inspectors found that Transrad SA had been transporting high-activity sealed radioactive sources without the relevant consent from the Health and Safety Executive (HSE).

Inspectors also identified that Reviss Services (UK) Ltd, when using the carrier services of another organisation, had not complied with legislation that consignments meet the requirements of the Agreement concerning the International Carriage of Dangerous Goods by Road (ADR).

Further information regarding these improvement notices can be found on [our website.](http://www.onr.org.uk/news/all-news/2025/01/transport-companies-issued-with-improvement-notice-for-shortfalls/)

# Incidents and operational experience

We are notified of transport incidents via our incident notification (INF1) reporting process; these incidents, along with previously reported incidents, are reviewed on a regular basis. This information is used to identify any trends/themes to allow us to better target our regulatory resources/provide appropriate guidance.

We have been made aware of several incidents of packages being delayed at airport in-transit stores due to issues with collection. Dutyholders should be aware when arranging transport through in-transit stores, collection should be made within an appropriate timeframe.

There have also been several incidents where excepted packages have been transported without correct marking or documentation. Dutyholders should be aware that when transporting excepted packages, ADR compliance is still required.

We have issued three inspector awareness briefs, and an inspector guidance note regarding specific areas of operational experience. These are in the process of being distributed to RPAs and DGSAs.

Incidents should be reported using the process identified on our [website](https://www.onr.org.uk/about-us/contact-us/notify-onr/).

# Security

TCA is also the enforcing authority for the Nuclear Industries Security Regulations (NISR) 2003. Where NISR 2003 applies, dutyholders must have an approved transport security statement and ensure they comply with the standards, procedures and arrangements that are stated in it. If dutyholders wish to amend their transport security statement, then they must gain approval from us before doing so.

In light of current world events, we would encourage all personnel to be vigilant and report any suspicious activity to their respective security representatives so concerns can be reported to us and/or local police.

# Radiological Protection

Before any civil transport of Class 7 dangerous goods occurs, the dutyholder must have a suitable and sufficient Radiation Risk Assessment (RRA) for normal transport operations (this could be preparation of a package, loading, in-transit storage and unloading at its destination as well as carriage) and transport events (accidents, breakdowns, theft etc).

On our website there is guidance on [transport radiation risk assessment](https://www.onr.org.uk/media/ndunfeng/td-tca-gd-003.docx).

We have been made aware of several carriers transporting High Activity Sealed Sources (HASS) without the appropriate consent certificate required under IRR17 Regulation 7. If you are aware of any carrier transporting HASS without a consent certificate, contact us.

# Changes to regulations and ONR guidance

The following regulations have been updated:

* [Agreement concerning the International Carriage of Dangerous Goods by Road (ADR 2025) | UNECE](https://unece.org/info/Transport/Dangerous-Goods/pub/395786)
* [Regulations Concerning the International Carriage of Dangerous Goods by Rail (RID 2025)](http://www.railconference.com/rid-2025/)
* [Technical Instructions For The Safe Transport of Dangerous Goods by Air (Doc 9284)](https://www.icao.int/safety/DangerousGoods/Pages/Doc9284-Technical-Instructions.aspx)
* [IMDG Code – 2024 Edition | IMO e-Publications](https://imo-epublications.org/content/books/9789280117974?utm_source=Landing+page&utm_medium=ePublications&utm_campaign=Carousel)

There will be transitional arrangements for each of the new regulations stated above where the dutyholder can still transport Class 7 under the old regulations for a period of time (in the case of ADR/RID this is six months from when the new regulations came into effect, whereas for IMDG it is a year).

# International

The TCA interfaces with other Competent Authorities across the world via bilateral and multilateral interactions, most notably through the UK representative on the IAEA Transport Safety Standards Committee (TRANSSC).

At the most recent (49th) meeting of TRANSSC in November 2024, the updated draft of IAEA SSR-6 was approved to go forward to final technical editing and forthcoming publication. Two notable changes within the updated IAEA SSR-6 are that the A1/A2 values for a number of radionuclides have been revised, and the definition of confinement system has been removed from SSR-6.

# Stakeholder engagement

We attend engagements to provide feedback on inspections, notifiable incidents, and enforcement action to different stakeholder groups.

In November, we provided a presentation at the Society for Radiological Protection Scottish Event (entitled ‘Getting it right when things go wrong’). Further information regarding the event is available on the [SRP website](https://srp-uk.org/news/article/392/getting-it-right-when-things-go-wrong-event).

If your organisation is part of a particular stakeholder forum or network within which ONR could participate, you can get in touch by emailing [contact@onr.gov.uk](mailto:contact@onr.gov.uk).

# Frequently Asked Questions (FAQs)

Refer to our [webpage](https://www.onr.org.uk/our-work/what-we-regulate/transport-of-radioactive-material/frequently-asked-questions/) to see responses to FAQs, which is updated on a regular basis.

Please note that we can only provide responses to FAQs which relate to legislation and guidance. For any other queries please contact your appointed RPA or DGSA.

# Feedback / Contact Us

What information do you think should be included within future TCA newsletters?

If you want to provide feedback, or need more information regarding the transport of Class 7 dangerous goods, our contact details are below:

**E-mail:** [contact@onr.gov.uk](mailto:contact@onr.gov.uk)