French regulatory framework

For all modes of transport, the <u>French Authority for Nuclear Safety and Radiation Protection</u> (ASNR) is the competent authority for the transport of radioactive materials (class 7). Questions concerning the french regulation can be asked to dts-transport@asnr.fr.

Regulations

The transport of dangerous goods **by road** is governed by the Agreement concerning the International Carriage of Dangerous Goods by Road, known as the ADR Agreement. The ADR is implemented by the <u>TMD Order</u> of 29 May 2009, and more specifically by its Annex I.

The transport of dangerous goods **by rail** is governed by the Regulation concerning the International Carriage of Dangerous Goods by Rail, known as the <u>RID</u> Regulation. The RID is implemented in France by the <u>TMD Order</u> of 29 May 2009, and more specifically by its Annex II.

The transport of dangerous goods **by inland waterway** is governed by the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways, known as the <u>ADN</u> Agreement. The ADN is implemented in France by the <u>TMD Order</u> of 29 May 2009, and more specifically by its Annex III.

The rules for international **maritime transport** are set by the International Maritime Organisation (IMO). In particular, the rules relating to the transport of dangerous goods derive from the 1974 International Convention for the Safety of Life at Sea, known as the « SOLAS Convention », and the rules relating to the transport of harmful substances derive from the International Convention for the Prevention of Pollution from Ships, known as the « MARPOL Convention ». These rules are contained in various international codes:

- the IMDG Code, for the transport of dangerous goods in packages;
- the IMSBC Code, for the transport of solid bulk cargoes;
- the INF Code, for the transport of irradiated nuclear fuel, plutonium and high-level radioactive waste in packages.

These rules are enforced in France by the <u>order of 23 November 1987</u> on ship safety and pollution prevention, and more specifically by the following divisions (Divisions 411 and 423) of its annexed regulations.

The <u>Regulations</u> for the Transport and Handling of Dangerous Goods in Seaports (known as « RPM ») also apply.

Shippers (consignors) must comply with a number of obligations when presenting dangerous goods for **air transport**. These obligations relate to:

- the training of their personnel;
- the classification, packaging, marking, labelling, storage and handling of dangerous goods and the associated documentation (in particular the dangerous goods declaration).

These obligations are defined in Annex 18 and in the Technical Instructions for the Safe Transport of Dangerous Goods by Air (Doc 9284) of the International Civil Aviation Organisation (ICAO) and the associated supplement, in their latest update.

<u>Authorisation and notification systems for companies transporting radioactive</u> substances on French territory

Pursuant to Article R. 1333-146 of the French Public Health Code, on 28 March 2025, the ASNR adopted the new resolution, reference no. 2025-DC-011, in order to introduce, in addition to the current notification system, an authorisation system for transport operations involving the most highly radioactive sources, regarding protection against malicious acts. Accordingly, this resolution:

- requires authorisation for carriers by road, on public highways in France, of radioactive sources or batches of radioactive sources in category A, B or C¹ (known as high-activity sealed sources or HASS),
- requires that companies transporting radioactive substances, that are not covered by the authorisation system or that are carried by other modes, be made subject to the notification system,
- requires that companies loading, unloading or handling radioactive sources, be made subject to the <u>notification system</u>,
- and repeals the previous ASNR resolution 2015-DC-0503.

The arrangements for notification and for applications for authorisation are set out in ASNR resolution 2025-DC-011. In particular, the new authorisation requirement will come into force on 1st January 2026. As a result, starting from that date, any carrier wishing to carry out carriage by road of radioactive sources or batches of radioactive sources in categories A, B or C should have an authorisation from the ASNR. In view of the fact that the statutory deadline for assessment of applications for authorisation has been set to six months, any carrier wishing to continue its transport activities of such sources at the beginning of 2026 is invited to submit its application promptly to the ASNR.

The supporting file specified in Annex 1B of the resolution shall be consistent with the provisions of the <u>order of 29 November 2019</u>, as amended, relating to the protection of sources of ionising radiation and batches of radioactive sources of categories A, B, C and D against malicious acts.

In addition, the new ASNR resolution introduces the obligation for any authorisation holder or notifying party to submit, at the latest by 30 April of each year, in an email addressed to DTS-transport@asnr.fr, information about the transport operations carried out during the previous year.

The <u>list</u> of carriers registered with the ASNR is published twice a year.

The **security of nuclear material** transport is the responsibility of the Ministry of Sustainable Development (HFDS).

¹ The <u>French regulations</u> define four categories (A, B, C and D), in descending order of radiological risk. This classification is set out in the French Public Health Code (annexes 13-7 and 13-8).

Accidents and transport incidents

Transport events (accidents and incidents) must be reported on the <u>ASNR teleservice portal</u> in accordance with <u>ASNR Guide No. 31</u>.

ASNR guides

The ASNR publishes guides for professionals concerned by the nuclear safety and radiation protection regulations (licensees, users or transporters of ionising radiation sources, general public, etc.). Each guide sets out recommendations which aim to:

- explain the regulations and the rights and obligations of the persons concerned by the regulations;
- explain the regulatory objectives and, as applicable, describe the practices ASNR considers to be satisfactory;
- give practical tips and information concerning nuclear safety and radiation protection.

These ASNR Guides are available on English on https://www.french-nuclear-safety.fr/information/publications section « *Publications for the professionals* ». The following are related to transport activities:

- Guide n° 2: Transport of radioactive materials in airports
- Guide n° 7: Applicant's guide related to applications for shipment approval and certificate of package design or radioactive materials for civil usage transported by public roads, by water or by rail
- Guide n° 17: Content of radioactive substance transport incident and accident management plans
- Guide n° 27: **Stowage** of radioactive packages, materials or objects for transportation
- Guide n° 31: Procedures for **notification of events concerning the transport** of radioactive materials on the terrestrial public highway, by sea or by air
- Guide n° 29: Radiation protection in radioactive substance transport activities
- Guide n° 44: **Quality management system** applicable to the transport of radioactive substances on public highways
- Filling-out of orange-coloured plates for the transport of radioactive substances

<u>Transport approvals and authorisations</u>

A document <u>lists</u> the **valid certificates and authorisations** for transport on public roads issued by the ASNR. This list is provided for information purposes only. It is the consignor's responsibility to ensure that the package complies with ASNR requirements. It is the responsibility of all consignor of radioactive substances to ensure that the package they wish to transport has a valid certificate of approval (or a certificate of compliance for packages not subject to approval) for all modes of transport envisaged and for the countries crossed.

For more information

- Regulations governing the transport of radioactive substances
- <u>Information for transport operators</u>