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## Inland Transport Committee

**Working Party on the Transport of Dangerous Goods****Ninety-fifth session**

Geneva, 4-8 November 2013

Item 6(b) of the provisional agenda

**Proposals for amendments to Annexes A and B of ADR:  
miscellaneous proposals****Training of drivers of vehicles carrying radioactive material  
UN 2915 and UN 3332, S12 in Chapter 8.5****Transmitted by the Governments of Sweden and Spain<sup>1</sup>***Summary*

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| <b>Executive summary:</b>  | In ADR 2013, S12 has been amended, unintentionally, as to require drivers of UN 2915 and UN 3332 to undergo a basic training course. This has not been required in the previous editions of ADR.  |
| <b>Action to be taken:</b> | Amend the reference concerning training of drivers in S12 and add some clarifying text.   |
| <b>Related documents:</b>  | ECE/TRANS/WP.15/2010/16 (eighty-ninth session of WP.15), paragraph 35 of ECE/TRANS/WP.15/2008 (report of the eighty-ninth session of WP.15), informal documents INF.5 from Spain (ninety-fourth session of WP.15), INF.9/Rev.1 from Sweden (ninety-fourth session of WP.15) and INF.28 from Germany, paragraph 29-31 of ECE/TRANS/WP.15/219 (report of the ninety-fourth session of WP.15). |

<sup>1</sup> The present document is submitted in accordance with paragraph 1(c) of the terms of reference of the Working Party, as contained in document ECE/TRANS/WP.15/190/Add.1, which provides a mandate to “develop and update the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR)”.

## Introduction

1. At the ninety-fourth session of the Working Party in May 2013, informal documents INF.5 from Spain and INF.9/Rev.1 from Sweden were discussed. The documents dealt with special provision S12 allocated to radioactive materials of UN 2915 or UN 3332. As from ADR 2013, the text in special provision S12 has been amended. The amendment was based on a proposal made by Sweden in document ECE/TRANS/WP.15/2010/16. However, the intention was not to change the scope of the requirement in S12, but only to simplify the text.
2. At the May meeting of the Working Party, an indicative vote was made to give some guidance to the upcoming work with an official proposal. This vote indicated that a majority of the meeting was in favour of amending the text as proposed by Spain in informal document INF.5 and as amended in informal document INF.9/Rev.1 by Sweden.

## Background

3. At the eighty-ninth session of the Working Party, Sweden made a proposal to amend special provisions S11 and S12 for the following reasons:

The general requirements concerning training of drivers are stated in section 8.2.1. These provisions are to be observed unless otherwise is stated, e.g. in a special provision. For this reason, it seems superfluous to repeat the same requirements in a special provision, which was the case in S11 in the previous edition of ADR. A special provision should rather state deviations from the general requirements or state provisions that apply in addition to the general requirements. For this reason, Sweden proposed to amend the text in S11. Since S12 contained references to S11, also this special provision was proposed to be amended.

4. The Working Party agreed to amend the text in S11 and S12. However, the reference in S12 that was proposed in Sweden's document, concerning exemption from the drivers training, was made to sub-section 8.2.1.4 which only deals with the specialization training course. In the previous edition of ADR, S12 also allowed drivers to be exempted from the basic training course. Thus, the reference should rather have been made to section 8.2.1, or to be even more comprehensible, to 8.2.1 and 8.2.2.

5. At the ninety-fourth session of the Working Party, a concern was raised that if the basic training course as well as the specialization training course were exempted, there was a risk that persons involved in the transport of these materials would lack of knowledge about other applicable provisions in ADR concerning these transports. However, if S12 would be amended in accordance with this document, as to hold the same requirement as in previous editions of ADR, S12 would only exempt the provisions concerning drivers training in sections 8.2.1 and 8.2.2 (basic and specialization training course), but the provisions in 8.2.3 will still apply for these transports as well as the requirement to have a safety adviser. Sweden and Spain believe this should be sufficient to ensure that the persons involved in these transports are trained in the requirements governing the carriage of such goods appropriate to their responsibilities and duties. Nevertheless, it might be clearer to indicate that the training shall be on the requirements governing the carriage of radioactive material. It could also be more user-friendly to use the same formulation as in 8.2.3 and include a "reminder" in S12 that the provisions concerning training in section 8.2.3 still are applicable.

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## Proposal

6. Amend S12 to read as follows (change underlined or stricken out):

“If the total number of packages containing radioactive material carried does not exceed 10, and the sum of the transport indices does not exceed 3, the requirements in 8.2.1-4 [and 8.2.2] concerning ~~specialization~~ training ~~course~~ for drivers [of vehicles carrying radioactive material] need not be applied. However, drivers shall then receive appropriate training [in the requirements governing the carriage of radioactive material], commensurate with and appropriate to their duties, which provides them with an awareness of the radiation hazards involved in the carriage of radioactive material. Such awareness training shall be confirmed by a certificate provided by their employer. [See also 8.2.3.]”

## Justification

Safety: No safety problems are foreseen. Persons involved in the transport chain must still undergo training in accordance with section 8.2.3. Furthermore, the provisions concerning safety adviser also applies.

Feasibility: These training procedures are already in use. Since this procedure has been applied for many years for these substances, no transitional period is needed.

Enforceability: No problems are foreseen.

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