

## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

Ninety-fourth session

Geneva, 14-16 May 2013

Item 6 (b) of the provisional agenda

**Proposals for amendments to Annexes A and B of ADR:  
miscellaneous proposals**

8 May 2013

### **Comments on INF.5 from Spain and INF.9/rev.1 of Sweden: S11 and S12: Training of drivers of vehicles carrying radioactive material UN 2915 and UN 3332**

#### **Transmitted by the Government of Germany**

1. Since its introduction in 2001, Germany understands the requirement S12 in Chapter 8.5 of the ADR as meaning that the exemption only applies to paragraphs (2) and (3) of S11 and that drivers performing the carriage of UN No. 2915 and UN No. 3332 must hold an ADR certificate after the basic training course under sub-section 8.2.1.2 of the ADR. Under the conditions of S12, specialization training pursuant to sub-section 8.2.1.4 of the ADR may be waived. For this reason, the Germany delegation had consented to the amendment applied for by Document ECE/TRANS/WP.15/2010/16 (Sweden).

2. The carriage of up to 10 packages as mentioned in S12 or of packages with a transport index of 3 and less continues to be subject to the provisions of ADR, and thus, also to the requirements for the training of drivers in section 8.2.1. The former paragraphs (1) and (2) in S11 had only a declaratory effect and did not themselves provide the basis for the training requirements.

3. Since 2001, the French version of the ADR has been deviating from the English version (underlined):

S12: Si le nombre total des colis contenant les matières radioactives transportées n'est pas supérieure à 10 et si la somme des indices de transport sur le véhicule n'est pas supérieure à 3, la prescription supplémentaire S11 ne s'applique pas. ...

4. Considering this wording "supplémentaire/additional" Germany concludes that S12 only revokes the requirement for an "additional" specialization training course in accordance with paragraphs (2) and (2) of S11. This is also supported by the fact, that the internal training course only refers to the "radiation hazards" and is not to teach the contents of the basic training course pursuant to sub-section 8.2.1.2 of the ADR.

5. From the German perspective, the wording of S12 adopted for 2013 is not to be objected, contrary to the comments in INF.5, and the application submitted by Sweden in INF.9/Rev. 1 has to be rejected.