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Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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

15 mars 2013

S11 and S12: Training for drivers of vehicles carrying radioactive material UN 2915 and UN 3332

Transmitted by the Government of Spain

Introduction

1. The additional requirement **S12** in chapter 8.5 establishes: 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 requirement in 8.2.1.4 concerning specialization training course for drivers of vehicles carrying radioactive material need not be applied. However, drivers shall then receive appropriate training, 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.
2. The S12 affects to the UN 2915 and UN3332 (See column 19 of Dangerous Goods List)
3. This text for the S12 was introduced in the last edition of ADR based on the proposal ECE/TRANS/WP.15/2010/16. The change in S12 was directly connected with the modification of the S11 additional requirement, which was also modified according to the same proposal. The proposal justified the modifications as a simple formal change (clarification of the text) considering that the text in S11 (1) and (2) were superfluous and could be deleted. However, the change is not just only formal; otherwise it is very substantial and has a significant impact on a large number of operators: transport of radioactive mobile gauges (UN 3332) and transports of radiopharmaceutical material (UN 2915).

4. The next table tries to show the differences between ADR 2011 and ADR 2013 on this issue:

ADR 2011	ADR 2013
<p>S11:</p> <p>(1) The requirements of 8.2.1 shall apply.</p> <p>(2) Drivers shall attend a specialization training course covering at least the subjects defined in 8.2.2.3.5.</p> <p>(3) If, according to other regulations applicable in the country of a Contracting Party, a driver has followed equivalent training under a different regime or for a different purpose covering the subjects referred to in (2), the specialization course may be totally or partially dispensed with.</p>	<p>S11:</p> <p>(1) The requirements of 8.2.1 shall apply.</p> <p>(2) Drivers shall attend a specialization training course covering at least the subjects defined in 8.2.2.3.5.</p> <p>(3) If, according to other regulations applicable in the country of a Contracting Party, a driver has followed equivalent training under a different regime or for a different purpose covering the subjects referred to in (2) defined in 8.2.2.3.5, the specialization course may be totally or partially dispensed with.</p>
<p>S12:</p> <p>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, special provision S11 need not be applied. However, drivers shall then receive appropriate training, 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.</p>	<p>S12:</p> <p>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, special provision S11 need not be applied <i>the requirement in 8.2.1.4 concerning specialization training course for drivers of vehicles carrying radioactive material need not be applied</i>. However, drivers shall then receive appropriate training, 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.</p>

So, in the ADR 2011, the S12 clearly established that the special provision S11 needed not be applied and, according to that, for UN 2915 and 3332 the requirements of 8.2.1 (general requirements concerning the training of drivers as to held a certificate issued by the competent authority and attend a basic training course) and 8.2.2.3.5 (specialization training course) needed not be applied 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.

However, in the ADR 2013 the subparagraphs (1) and (2) in S11 have just disappeared and the S12 only refers to the exemption of the specialization training course (8.2.1.4). Then, according to the present provision: the drivers of vehicles transporting UN 2915 or UN 3332 packages (although the total number of packages carried does not exceed 10 and the sum of the transport indices does not exceed 3) have to comply with the general requirements concerning the training of drivers: to held a certificate issued by the competent authority and attend a basic training.

5. Consequently, the change is very substantial in spite of the original proposal was presented as a simple formal change. In fact, the original proposal also affected to the class 1 material (See S1) but in that case the change (similar in S1 to that in S11) was really formal whereas in the case of class 7 (S11) has been substantial because S11 and S12 are connected for the case of UN 2915 and UN3332.

Proposal

6. To revert the S11 and S12 to the former text in ADR 2011:

S11:

- (1) The requirements of 8.2.1 shall apply.
- (2) Drivers shall attend a specialization training course covering at least the subjects defined in 8.2.2.3.5.
- (3) If, according to other regulations applicable in the country of a Contracting Party, a driver has followed equivalent training under a different regime or for a different purpose covering the subjects referred to in (2), the specialization course may be totally or partially dispensed with.

S12:

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, special provision S11 need not be applied. However, drivers shall then receive appropriate training, 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.

Justification

7. The modification of S11 and S12 in ADR 2013 was considered as a simple formal change but it affects seriously to some kind of transports of radioactive material and its impact was not taking into account adequately.
