

## **Economic Commission for Europe**

### **Inland Transport Committee**

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

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Item 6 (b) of the provisional agenda

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

**9 April 2013**

### **Comments on INF.5 from Spain S11 and S12: Training of drivers of vehicles carrying radioactive material UN 2915 and UN 3332 (Revised)**

**Transmitted by the Government of Sweden**

#### **Introduction**

Sweden supports the aim of Spain's proposal and agrees that if the conditions in special provision S12 are met, the requirements concerning training of drivers in section 8.2.1 do not apply for the carriage of UN 2915 or UN 3332.

The decision to amend special provisions S11 and S12 was based on a proposal from Sweden (2010/16). However, the intention was not to require a basic training course for the carriage of UN 2915 or 3332, but only to simplify the text in these special provisions.

#### **Background**

Section 8.2.1 states the general requirements concerning training of drivers. 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 requirement in a special provision. According to our understanding, 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 proposes another solution to the same problem as described in INF.5.

#### **Proposal**

Amend special provision S12 to read as follows:

“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...”