

## Economic Commission for Europe

### 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**

28 October 2013

### **Comment on ECE/TRANS/WP.15/2013/8 concerning the training of drivers of vehicles carrying radioactive material UN 2915 and UN 3332, S12 in Chapter 8.5**

#### **Transmitted by Government of Austria**

Austria sees certain advantages in the proposal made by the governments of Spain and Sweden. Nonetheless it might cause problems. Almost all dangerous goods can become UN 2915 by adding something radioactive; an exempt from training requirements due to an additional hazard cannot be justified. Exception from the training of drivers should only be allowed when radioactive materials with no subsidiary risks are carried. However, UN 2915 can have almost all subsidiary risks. With regard to such cases the driver should not be allowed a training exemption. Austria therefore proposes to amend the proposal of the governments of Spain and Sweden.

"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 and there are no subsidiary risks, 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.]"