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Safety Adviser Examination (sub-section 1.8.3.13)

Transmitted by AEGPL

SUMMARY	
Executive summary:	The Safety Adviser Examination is based on sub-section 1.8.3.13 of RID / ADR, with 5 complementary levels of class expertise, one of which is dedicated to Class 2. As the current Class 2 Safety Adviser Examination has proven to be adequate for LPG, AEGPL requests that it be maintained. Moreover, in light of their specific characteristics, Class 2 products should be treated as a separate category.
Action to be taken:	Do not change indent 2 of sub-section 1.8.3.13 related to Class 2.
Related documents:	ECE/TRANS/WP.15/AC.1/2008/17 (United Kingdom)

Background

- 1. Currently, sub-section 1.8.3.13 of RID / ADR allows for Safety Advisers to sit 1 or several of the following exams:
 - Class1 (explosives).
 - Class 2 (gas).
 - Class 7 (nuclear).
 - Classes 3, 4.1, 4.2 4.3 5.1 5.2, 6.1, 6.2 8 and 9.
 - N° UN 1202, 1203, 1223.

- 2. The purpose of ECE/TRANS/WP.15/AC.1/2008/17, presented by the United Kingdom is to remove or restrict the option of examining dangerous goods Safety Advisers on specific classes or substances, with 3 alternative proposals:
 - Option 1: Delete indent five of 1.8.3.13.
 - Option 2: Delete indents two and five of 1.8.3.13.
 - Option 3: Delete the whole of 1.8.3.13.

Analysis

- 3. Along the supply chain, 36 % of LPG is transported by barge or mono-product rail-tanker, 33 % is transported by mono-product road-tanker and 31% is transported in cylinders, generally in baskets by dedicated vehicles. Nearly all transport of LPG is therefore undertaken in a specific manner.
- 4. Based on its properties, LPG is included in Class 2. Class 2 Safety Advisors have a comprehensive vision of all gases in this class and of LPG in particular, making him well-equipped to provide analysis and recommendations.
- 5. For the LPG sector, representing 9000 trucks in Europe, the disappearance of the 2nd indent (and the integration of Class 2 into one of the remaining classes option 2- or in all classes option 3 -) could dilute level of expertise and focus allotted to gas.
- 6. Moreover, for those Advisors having a competence limited to one specific class which would be merged into a larger category, there would be considerable uncertainty as to their right and capacity to extend their competences.

Proposal

- 7. For these reasons, the AEGPL favours the maintenance of a Class 2 Safety Advisor exam and by extension the non-modification of the 2nd indent in sub-section 1.8.3.13 of RID / ADR.
- 8. In the event that ECE/TRANS/WP.15/AC.1/2008/17 were to be adopted, the AEGPL requests that transitional measures permitting existing Safety Advisors to integrate themselves into the new system be examined in parallel.
