

Working Party on the transport of dangerous goods

**Joint Meeting of the RID Safety Committee
and the Working Party on the Transport of
Dangerous Goods**

(Bern, March 2003)

1.8.3 SAFETY ADVISER

Comments by the Government of Belgium to proposals TRANS/WP.15/AC.1/2003/3
(Liechtenstein) and TRANS/WP.15/AC.1/2003/26 (IRU)

1. Introduction

During the session of the RID/ADR Joint Meeting held in Geneva from 9 to 12 September 2002, the Belgian document TRANS/WP.15/AC.1/2002/21 on the renewal of the professional training certificate for the safety adviser (1.8.3.16) was discussed, and the following was noted (cfr. TRANS/WP.15/AC.1/90) :

- several delegations considered that the administrative and procedural blockage on the European Commission level should not prevent the development of the provisions of 1.8.3 relating to the safety adviser so that any practical problems of application in international transport could be settled (point 33) ;
- as far as the basic principle was concerned, the Joint Meeting confirmed that the renewal of the certificate could be based on a training course or on an examination, and that the examination was not compulsory if the refresher course had been taken (point 34) ;
- the Joint Meeting decided by a large majority that a set of minimum requirements should be established in respect of measures for harmonising training courses and examinations (point 35).

2. Overview of the existing situation

Annex 1 gives the situation that exists at this moment in several countries with respect to the following points :

- has the option mentioned in 1.8.3.13 been introduced in national legislation ?
- what is the minimal duration of the initial training course, if any ?
- what are the criteria to pass the initial examination (in %) ?
- are already criteria in existence for the refresher courses and/or the corresponding examinations ?

3. Comments on proposal TRANS/WP.15/AC.1/2003/3 (Liechtenstein)

3.1. To change the period of validity of the certificates (3 instead of 5 years) :

Belgium is of the opinion that the discussion on this subject should be postponed, for the following reasons :

- if it would be decided to change the period of validity of the certificates, the same change would have to be made at the same moment in the European directive concerning safety

advisers (in order to avoid contradictions), and this would not be easily achieved at the moment (cfr. point 32 of the report of the last Joint Meeting) ;

- the requirements for the renewal of the certificates have to be introduced at the country level as from 2004 (in EU-member states) ; therefore, the establishment of a set of harmonised minimum requirements is extremely urgent and should be dealt with first.

3.1. To demand a training course and an examination for the renewal of the certificate :

During the previous session of the Joint Meeting an overwhelming majority was of the opinion that the existing either/or-requirement should remain (point 34 of the report of the last Joint Meeting) ; in view of this, Belgium is of the opinion that it would not be very useful to reopen the discussion on this matter.

3.2. The requirements for the refresher courses and examinations should be equivalent to not less than 50 % of those for the initial courses and examinations :

This requirement creates several problems :

- the minimum duration of the initial training course is not specified ; with this proposal, there would be no minimum duration for the refresher course either ;
- apart from the number of questions, it not clear at all what “equivalent to not less than 50 % of the requirements“ means (especially with respect to “covering at least the subjects mentioned in 1.8.3.11”, “two multiple choice questions count as one open question”, “candidates shall undertake a case study”).

For the above reasons, Belgium thinks that the minimum requirements should be specified more clearly.

4. Comments on proposal TRANS/WP.15/AC.1/2003/26 (IRU)

4.1. Proposal in 2 (a) :

The proposed text will not necessarily increase the level of harmonisation (on the international and even on the national level) because of the great number of trade associations and training associations in existence. The competent authorities could have a lot of minimum standard requirements to choose from.

4.2. First paragraph of the proposal in 2 (b) :

See the comment in 3.1 on the proposal from Liechtenstein.

4.3. Second paragraph of the proposal in 2 (b):

No objection in principle.

4.4. Third paragraph of the proposal in 2 (b):

Same remark as in 4.1.

4.5. Proposals in 2 (d), (e) and (f) :

Here again, the same changes would have to be made at the same moment in the European directive concerning safety advisors (in order to avoid contradictions), and this is not easy ; moreover, these proposals should only be dealt with after the requirements concerning security have been sufficiently discussed.

5. Belgian proposals concerning the refresher course and the examination for the extension of the validity of the certificate

Taking into account what precedes, Belgium proposes to change the existing 1.8.3.16 into subparagraph 1.8.3.16.1 and to add the following new subparagraphs :

“1.8.3.16.2 The aim of the refresher course is to ascertain that candidates still possess the necessary level of knowledge to carry out the duties incumbent upon a safety adviser as listed in 1.8.3.3 including requirements governing the carriage of dangerous goods introduced after the last training and/or examination.

1.8.3.16.3 The minimum duration of the refresher course shall be as follows :

- comprehensive refresher course : 24 hours for the initial transport mode
6 hours per additional transport mode
- refresher course for one type of goods
(if 1.8.3.13 is applied) : 18 hours for the initial transport mode
3 hours per additional transport mode
- refresher course for every additional
type of goods : 6 hours for the initial transport mode
3 hours per additional transport mode

1.8.3.16.4 Not more than six teaching hours are permitted on each day of the course.

1.8.3.16.5 The examination for the extension of the validity of the certificate shall be held and supervised on the same basis as in 1.8.3.10 to 1.8.3.14. However, the candidates need not to undertake the case study specified in 1.8.3.2.12 (b).”

6. Justification for the Belgian proposals

It is important to specify the aim of the refresher course, as has already been done for the initial training in 1.8.3.9. The proposed text of IRU, which is very satisfactory, has been used (with some minor changes to the wording).

As the refresher course will not be controlled by an examination (contrary to the initial training), additional requirements are necessary to guarantee a minimum level of quality. Because of the diversity that already exists amongst the initial training programmes in different countries, it is to be expected that a minimum duration is the best that can be achieved. The Belgian proposal is inspired by what exists for the driver training in ADR (paragraph 8.2.2.4.1 and 8.2.2.5.3), taking into account the different duties of safety advisors and drivers.

An examination needs to check whether the candidates are able to perform the duties imposed on them. Therefore, there is no reason why the initial examination should differ from the following ones for the part that checks the knowledge of the candidates. On the other hand, the capability of the candidates to undertake a case study is independent of their knowledge and need not be checked again.

Annex 1

Country	Option of 1.8.3.13	Minimal duration of initial training	Criterion to pass the initial exam.	Criteria for extension
Austria	yes	32 h + 10 h/mode (16h + 5 h/mode in the case of 1.8.3.13)	80 % or 60 % + oral	
Norway	yes	no minimum	67 %	
Yugoslavia	yes	4 days	80 %	
Poland	no	4 days	80 %	
Bulgaria	no	7 days	80 %	
Liechtenstein	no	4 days	80 %	2 days
Latvia	yes	8 days		
Portugal	no	70 hours	50 %	35 hours
Denmark	no	no minimum	60 %	only examination
Finland	no	ca. 3 days	70 %	
Sweden	no	no minimum	60 %	60 %
UK	yes	no minimum	65 %	65 % and no minimum
Germany	yes	30 h (incl. 1 mode) + 10 h per additional mode	50 %	
France	yes	no minimum	60 %	duration of initial training (4,5-6 days)
Belgium	yes	5 days (liquids) + 2 days (gas) + 1 day per mode	60 %	