

ECONOMIC COMMISSION FOR EUROPE

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

Sub-Section 8.2.2: Certificate of Driver's Training

Transmitted by the Government of Belgium

Background

1. In ECE/TRANS/WP.15/2009/14, the representative of the United Kingdom proposes to include a photograph on the certificate for drivers carrying dangerous goods, based on the arguments that the addition of a photograph on the certificate should provide :

- “ *A verification at a glance as to whether the driver is actually the certificate holder. This would be particularly helpful for roadside checks and national and international cross border enforcement;*
- *A deterrent because the certificate would be harder to replicate or forge; and*
 - *A more secure document through the amalgamation of the driver's photograph with his ADR qualification entitlement in a plastic card format which would make the system much more secure and help reduce the possibility of forgery or fraudulent identity, theft and misuse.”*

2. A simple cost-benefit analysis shows that this inclusion is not justified :

- On the one hand, the above-mentioned benefits are very limited. All drivers are already in the possession of one or more official documents with their photograph:
- In international transport, they have to carry their passport or identity card, which they will be asked to show during any serious roadside check;
- In national transport, all drivers possess a driver's licence that can fulfil this role if the competent authority introduces the obligation to carry this document whilst driving (a measure already in place in almost all countries).

3. The second and the third benefit mentioned above are identical : reduce the possibility of forgery or of theft and misuse. But it should not be forgotten that a new model with an additional security feature has already been decided upon. Adding a photograph will make no

difference for forgers that are capable of producing these new plastic cards with the safety feature. Moreover, theft and misuse is easily detected during roadside checks by comparing the training certificate with the driver's licence (part of the normal control procedure in Belgium) or by checking with the databases of driver's certificates that are now made obligatory.

- On the other hand, it is obvious that the addition of a photograph will make the delivery procedure more complicated, slower and more expensive, especially in counties with several training- and/or examination institutes where it is not possible to produce the photographs in one place. Substantial economical losses due to longer waiting periods for the drivers are also to be expected. Moreover, the inclusion of photographs will increase the memory capacity needed for the data base drastically (in Belgium this will necessitate the renewal of the entire system).

Proposal

4. Eliminate, in the model proposed in 8.2.2.8.5 of ECE/TRANS/WP.15/2009/14, the mention "(Insert driver photograph*)".
