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INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

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Item 5(a) of the provisional agenda

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Remarks on document ECE/TRANS/WP.15/2009/16:

Duration of refresher training

Transmitted by the Government of Switzerland

**SUMMARY**

Executive Summary:	The duration of the refresher training shall not be shorter than two days.
Action to be taken:	Change the text in 8.2.2.5.3
Related documents:	ECE/TRANS/WP.15/2009/16

**Introduction**

1. By reading the document ECE/TRANS/WP.15/2009/16, we feel that there is an internal contradiction in the proposed solution in 8.2.2.5.3.
2. The example presented in the asterisk "\*" shows that, even by following a whole set of refresher trainings, one can never achieve two days duration for the refresher training, because 14 training units (6+4+2+2) is less than the 16 training units required in the first sentence of 8.2.2.5.3 for a two days training.
3. In fact we believe that the "one third rule" laid down in the added text in 8.2.2.5.3 should not change the actual situation. For the moment being, simply a two days training course for the refresher training is required, independently of the number of specialization courses followed (tanks, class 1 and class 7). We agree however that for the future, in view of the multiplicity of possible restricted courses: per class, per UN-Number, per type of products (petrol products), etc, which can be followed by a driver, the proposed rule in the end of the sentence in the first paragraph in 8.2.2.5.3 does make sense. But this should only apply for the case where the driver follows more trainings than it is possible now, that is in the case where he has followed more than the basic course and three specializations (or restricted courses in the future).

## Proposal

4. In that case, we should rewrite the text as follows:

8.2.2.5.3 The duration of the refresher training including individual practical exercises shall be of at least two days for comprehensive training courses or for individual courses.

8.2.2.5.4 For refresher training including more than four training courses (for example a basic course, a basic restricted course for class 2, specialization tanks, class 1 and class 7) the duration of the refresher training shall be at least one third the duration allocated to the corresponding initial basic or initial specialization courses as specified in 8.2.2.4.1.

## Justification

8.2.2.5.3 We don't need the precision "for comprehensive training courses or for individual courses.". Today, independently of the kind of first training followed (basic course or comprehensive course), the rule of two days apply. It doesn't seem us necessary to complicate the text with unnecessary precisions.

8.2.2.5.4 The proposed solution doesn't change the actual rule in ADR which states that for basic, specializations in tanks, class 1 and class, independently of the number of courses followed by the initial training programme, the refresher training duration is of two days. The "one third rule" applies only by initial training programmes of more than 4 courses.

5. Written in this way, the new "third rule" is not in conflict with the "two days rule" because, like shown in the example of the asterisk "\*" in the document of Ireland, if one has followed in addition a restricted basic course for class 2, this implies at least 6 training units more by the refreshing training, that is 20 training units (6+6+4+2+2), which is not less than the required minimum of two days. In the case of an additional restricted specialization tanks (4 training units) the total is 18 training units. Again more than the two days rule.

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