

INF.10

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

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Item 5 of the provisional agenda

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Sections 8.2.1 and 8.2.2: Driver training
Comments in response to INF.3 (ECE/TRANS/WP.15/2009/4)
from the United Kingdom

Transmitted by the Government of Sweden

Background

Sweden appreciates the work done by the United Kingdom, and we fully support the idea of introducing a compulsory harmonized ADR certificate.

After having studied the proposal in INF.3 we would, nevertheless, like to suggest some additional amendments.

In an attempt to present our proposals as clearly as possible, we have only reproduced these parts of the texts where we have proposals for amendments - all other text is left out. Directly under each of our proposals, we have presented a comment to our proposal.

Proposals

The following proposed amendments are based on the text proposed by the United Kingdom in INF.3 (change underlined and highlighted with yellow marking):

- 8.2.1.2 Drivers of vehicles carrying dangerous goods other than in tanks shall attend a basic training course. Training shall be given in the form of a course approved by the competent authority. Its main objectives are to make drivers aware of hazards arising in the carriage of dangerous goods and to give them basic information indispensable for minimizing the likelihood of an incident taking place and, if it does, to enable them to take measures which may prove necessary for their own safety and that of the public and the environment, for limiting the effects of an incident. This training, which shall include individual practical exercises, shall act as the basis of training for all categories of drivers covering at least the subjects defined in 8.2.2.3.2. The competent

authority may approve restricted basic training courses limited to specific dangerous goods or a specific Class or Classes of dangerous goods other than those specified in 8.2.2.3.4 or 8.2.2.3.5.

- 8.2.1.3 Drivers of vehicles or MEMUs carrying dangerous goods in fixed tanks or demountable tanks with a capacity exceeding 1 m³, drivers of battery-vehicles with a total capacity exceeding 1 m³ and drivers of vehicles or MEMUs carrying dangerous goods in tank-containers, portable tanks or MEGCs with an individual capacity exceeding 3 m³ on a transport unit, shall attend a specialization training course for carriage in tanks covering at least the subjects defined in 8.2.2.3.3. The competent authority may approve restricted tank specialization training courses limited to specific dangerous goods or to a specific Class or Classes of dangerous goods other than those specified in 8.2.2.3.4 or 8.2.2.3.5.

Comments to 8.2.1.2 and 8.2.1.3

1) If “other than in tanks” is inserted in 8.2.1.2, basic training is not required for carriage in tanks. Therefore, we propose to delete the words “other than in tanks”.

2) We believe that the sub-sections that currently specify certain Classes of dangerous goods are sub-section 8.2.2.3.4 and 8.2.2.3.5. Therefore, we suggest the references in the end of 8.2.1.2 and in 8.2.1.3 are amended accordingly.

- 8.2.1.7 Initial training courses, refresher **training** courses, practical exercises, examinations and the role of competent authorities shall comply with the provisions of 8.2.2.

Comment to 8.2.1.7, 8.2.2.3, 8.2.2.4, 8.2.2.7

In order to harmonize the expressions concerning the training courses (e.g. the use of the name “basic course” or “basic training course”), we proposes to include the word “training” in all places in the text where different types of training courses are mentioned.

- 8.2.1.8 All training certificates conforming to the requirements of this section and issued in accordance with ~~the model shown in~~ 8.2.2.8.3 by the competent authority of a Contracting Party shall be accepted during their period of validity by the competent authorities of other Contracting Parties.

Comment to 8.2.1.8

Since 8.2.2.8.3 specifies dimensions, material, colour etc, and also include a reference to 8.2.2.8.5, we believe that 8.2.2.8.3 is the most appropriate reference as proposed by the United Kingdom. However, since the model of the ADR certificate is shown in 8.2.2.8.5 we suggest to delete the words “the model shown in”.

8.2.2.3 *Structure of training*

8.2.2.3.1 Initial and refresher training shall be given in the form of a basic **training** course and, when applicable, specialization **training** courses.

8.2.2.3.2 Subjects to be covered by the basic course and the restricted basic **training** course shall be, at least:

(a) ...

8.2.2.3.3 Special subjects to be covered by the specialization **training** course for carriage in tanks shall be, at least:

(a) ...

8.2.2.3.4 Special subjects to be covered by the specialization **training** course for the carriage of substances and articles of Class 1 shall be, at least:

(a) ...

8.2.2.3.5 Special subjects to be covered by the specialization **training** course for the carriage of radioactive material of Class 7 shall be, at least:

(a) ...

8.2.2.4 *Initial training programme*

8.2.2.4.1 The minimum duration of the theoretical element of each initial course or part of the comprehensive course shall be as follows:

Basic **training** course 18 teaching units¹

Specialization **training** course for carriage in tanks 12 teaching units¹

Specialization **training** course for carriage of substances and articles of Class 1 8 teaching units

Specialization **training** course for carriage of radioactive material of Class 7 8 teaching units

Where a competent authority has authorised a restricted basic or restricted tank specialization training course the number of teaching units may be reduced to not less than 10 teaching units **per course**.

Comment to 8.2.2.4.1

We believe it must be clear if it is 10 teaching units each or 10 teaching units all together that is required. Sweden suggests that not less than 10 teaching units per course shall be required.

8.2.2.4.2 The total duration of the comprehensive course may be determined by the competent authority, who shall maintain the duration of the basic training course and the specialization training course for tanks, but may supplement it with shortened specialization training courses for Classes 1 and 7.

8.2.2.4.4 Normally, not more than eight teaching units are permitted on each day of the course training day.

Comment to 8.2.2.4.4

We suggest harmonizing the text with the text in 8.2.2.5.4.

8.2.2.6.6 The approval document shall indicate whether the courses concerned are basic, ~~restricted basic, restricted tank specialization~~ or specialization courses, initial or refresher courses.

Comments to 8.2.2.6.6

1) We believe the expression “basic training” may include the current basic training as well as the proposed restricted basic training course. Therefore, we would prefer to keep the existing text in ADR.

2) Similar to our reasoning above, we believe the expression “specialization course” may include the current specialization courses as well as the proposed restricted course for tank.

8.2.2.7 Examinations

8.2.2.7.1 Examinations for ~~the~~ initial basic ~~or restricted basic~~ training courses

8.2.2.7.1.1 After completion of ~~the a~~ basic training ~~or restricted basic training course~~, including the practical exercises, an examination shall be held on the ~~basic or restricted~~ applicable basic training course.

Comment to 8.2.2.7.1 and 8.2.2.7.1.1

As already mentioned (see comment to 8.2.2.6.6), we believe the expression “basic training” may include the current basic training as well as the proposed restricted basic training course.

8.2.2.7.1.2 In the examination, the candidate has to prove that he has the knowledge, insight and skill for the practice of professional driver of vehicles carrying dangerous goods as provided in the basic training or restricted basic training course.

8.2.2.7.2 *Examinations for initial specialization ~~or restricted specialization training~~ courses for carriage in tanks or ~~initial restricted tank specialization courses for carriage in tanks or~~ for carriage of explosive substances and articles or radioactive material*

- 8.2.2.7.2.1 After having sat the examination on a the basic training course and after having attended the a specialization training or restricted specialization course for carriage in tanks or for the carriage of explosive or radioactive material, the candidate shall be allowed to take part in the corresponding examination.

Comment to 8.2.2.7.2 and 8.2.2.7.2.1

We believe the expression “specialization course” may include the current specialization courses as well as the proposed restricted one for tank.

- 8.2.2.7.2.2 This examination shall be held and supervised on the same basis as in 8.2.2.7.1. The catalogue of questions referred to in 8.2.2.7.1.3 shall also include the items summarized in 8.2.2.3.3 – 8.2.2.3.5.

Comment to 8.2.2.7.2.2

We believe that the catalogue of questions referred to in 8.2.2.7.1.3 should cover the items summarized in 8.2.2.3.3 – 8.2.2.3.5 to include the subjects to be covered by the specialization courses for tank, Class 1 and Class 7.

- 8.2.2.8.1 According to 8.2.1.8, the certificate shall be issued:

- (a) After completion of a basic training course, provided the candidate has successfully passed the examination in accordance with 8.2.2.7.1;
- (b) If applicable, after completion of a specialization course for carriage in tanks or carriage of explosive substances and articles of Class 1 or articles or of radioactive material of Class 7, or after having acquired the knowledge referred to in special provisions S1 and S11 in Chapter 8.5, provided the candidate has successfully passed an examination in accordance with 8.2.2.7.2.
- (c) If applicable, after completion of a restricted basic or restricted tank specialization training course, provided the candidate has successfully passed the examination in accordance with 8.2.2.7.1 or 8.2.2.7.2. The certificate issued shall clearly indicate its limited scope of validity to the relevant dangerous goods or Class/es.

If an examination is based on a restricted basic training course, this limits the scope of the specialization course.

Comment to 8.2.2.8.1 (b)

We suggest harmonizing the text with the wording in e.g. 8.2.1.4, 8.2.2.3.4 and 8.2.2.4.1.

Comments to 8.2.2.8.1 (c)

1) We suggest adding a reference to 8.2.2.7.2, since this sub-section deal with the examinations for initial specialization training courses for tank, Class 1 and Class 7.

2) We have added a new paragraph in 8.2.2.8.1 to clarify that in cases where an examination is based on a restricted basic training course, this must also limit the scope of the specialization course.

8.2.2.8.5 Model for the training certificate for drivers of vehicles carrying dangerous goods

Front

	**
ADR DRIVER TRAINING CERTIFICATE	
GB*	
	1. CERTIFICATE NO.:
	2. SURNAME:
	3. OTHER NAME(S):
	4. DATE OF BIRTH: yyyy/mm/dd
Insert	5. NATIONALITY:
driver	6. DRIVER SIGNATURE:
photograph	
	7. **
	VALID UNTIL: yyyy/mm/dd

* Distinguishing sign for motor vehicles in international traffic prescribed in the Vienna Convention on Road Traffic (1986)

**** This space is reserved for the official language of the issuing country, if this language is not English, French or German**

Comment to 8.2.2.8.5 (front of certificate)

1) We would like to suggest that the international standard for date and time representations, ISO 8601, is followed in order to avoid any confusion. E.g. in Sweden, ISO 8601 is closely followed in most written documents. Dates are generally and officially written for example “2009-03-31”. However, if this standard is not as commonly used in other ADR-countries, we would not really have any difficulties to agree with the year being indicated as in your proposal (dd/mm/yyyy), but we would then like to propose to indicate the year with four digits (“yyyy”).

2) To avoid differences between the countries certificates, we suggest including some kind of markings that illustrates where the text of a second language (as required in 8.2.2.8.4) shall be displayed.