

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Eighty-fifth session  
Geneva, 28-31 October 2008  
Item 5 of the provisional agenda

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Sub-section 8.2.2.8: Certificate of driver's training  
Comments in response to INF.4 (ECE/TRANS/WP.15/2008/10/Rev.1) from Portugal and  
IRU and in response to INF 6 from the United Kingdom

Transmitted by the Government of Sweden

Sweden appreciates the proposal from Portugal and IRU and fully supports the idea of having a compulsory harmonized ADR Certificate. However, we have some concerns about the details in the proposal. Our aim in this document is, therefore, to concur with the suggestion made by the United Kingdom in INF.6 and carry Portugal's and IRU's proposal forward to a future session.

Nevertheless, we would like to contribute to Portugal's and IRU's work by presenting our view.

1. At the previous session, some countries said they were facing difficulties in determining whether the foreign ADR Certificates were genuine or not. Swedish enforcement bodies have expressed the same concerns, and we believe that a uniform way of validating the genuineness of the certificates, such as holograms, watermarks, etc, would be advantageous. This view is also reflected in the document from Portugal and IRU, though we cannot see that it is included in the proposal. The same seems to be the case for the compulsory certificate layout. The aim, which we support, is clearly reflected in the analysis, but does not seem to be included in the proposal.
2. Sweden supports the proposed dimensions of the certificate, as they are identical to the driving licence (ISO 7810 ID-1). However, since space is quite limited, it is important to limit the amount of information on the certificate to improve readability.

3. The proposal does not indicate the type of material to be used for making this certificate. We believe the certificate shall be a plastic “credit card” model, already used in most EU countries as driving licences. This allows for greater protection against forgery. The aspect of anti-fraud protection has been identified as a major cause of concern in INF.4, but the idea is not carried in the proposal. Sweden is of the opinion that if a new model is required, anti-fraud protection must be included.
4. We also support the proposal of numbering the different fields. This facilitates the interpretation of the information during roadside checks involving international transports. Using these clearly defined numbers minimizes the need for multiple languages and adheres to driving license models currently in use (Compare COUNCIL DIRECTIVE 91/439/EEC of 29 July 1991 on driving licences, Annex 1a).
5. Furthermore, we agree with the view of the United Kingdom that black letters on an orange background would not be advantageous, especially during an evening/night road check during the evening or at night.
6. We cannot support the text proposed for the back of the certificate for two reasons (i.e. “*This certificate is valid only if it is accompanied by a valid driving licence for the category of vehicle concerned.*”). Firstly, there are no current regulations in ADR that require a person to possess a driving licence in order to receive an ADR certificate. Secondly, we are not convinced that such a situation would be desirable, since there are persons other than drivers (such as members of the vehicle crew) who use their ADR-certificate as validation of training required in Chapter 1.3. For these reasons, we do not support the idea of including the driving licence number on the certificate either (field 4 in the proposal).
7. Lastly, if the ADR certificate is to have a field (field 7 in the proposal) that shows it is restricted to classes other than class 1 and 7, we are of the opinion that this possibility first must be introduced in the requirements about training and examination. However, we would like to clarify that Sweden has not yet determined whether we support the introduction of such a possibility or not.

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