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**Economic Commission for Europe****Inland Transport Committee****Working Party on the Transport of Dangerous Goods**

**Joint Meeting of Experts on the Regulations annexed to the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) (ADN Safety Committee)**

**Thirty-second session**

Geneva, 22–26 January 2018

Item 4 (d) of the provisional agenda

**Implementation of the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN):  
Training of experts**

**ADN sections 8.2.1 and 8.2.2 – Training of experts**

**Transmitted by the Government of Germany\*\*\*\***

*Summary*

**Executive summary:** The current requirements for the training of experts in ADN section 8.2 contain some provisions that are unclear.

ADN section 8.2.1 and subsection 8.2.2.8 contain some redundant or even contradictory provisions concerning the issuance and renewal of expert certificates.

For the issuance and renewal of expert certificates, subsection 8.2.2.8 does not address the specificities regulated by subsections 8.2.1.5 and 8.2.1.7 for specializations for gases or chemicals (evidence of specific activity on board a relevant vessel).

At the German delegation's proposal, and following a discussion in the informal working group on the training of experts, the Safety Committee decided at its twenty-seventh session, held in August 2015, that ADN specialized knowledge certificates would in future take the form of a small card with a photograph. The format change was planned to take

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place in 2019 at the earliest.

**Action to be taken:** Amendments to ADN section 8.2.1, new wording of ADN subsection 8.2.2.8 and section 8.6.2, for entry into force on 1 January 2019, with a transitional requirement relating to the new certificate format.

**Related documents:** ECE/TRANS/WP.15/AC.2/52, para. 13  
ECE/TRANS/WP.15/AC.2/2015/31, paras. 22 and 23  
ECE/TRANS/WP.15/AC.2/56, para. 26  
ECE/TRANS/WP.15/AC.2/2017/4, para. 18  
ECE/TRANS/WP.15/AC.2/62, para. 33

## Introduction

1. Following an initiative taken by the German delegation, at its twenty-fifth session, in 2014, the Safety Committee expressed its support for the principle of using the format already adopted under ADR rather than a plasticized card, for ADN specialized knowledge certificates.
2. Subsequently, the informal working group on the training of experts considered in greater detail some corresponding proposals put forward by the German delegation for the corresponding amendment of ADN, most recently at its meeting held in March 2017.
3. In the interim, the “card” format was introduced into general use for inland navigation for the Rhine licences issued in accordance with the instructions of the Central Commission for the Navigation of the Rhine.
4. Apart from changing the format of the certificate, the German delegation also noted that some unclear provisions remained in section 8.2.1. This relates in particular to the experts’ certificates for chemicals and gases, the requirement for evidence of activity on board a relevant vessel and provisions concerning the deadlines for renewal of expert certificates.
5. The German delegation thanks the informal working group on the training of experts for its support in drawing up the request for a definitive amendment.
6. A first request for amendment was submitted to the Safety Committee for its thirty-first session. It was returned to the German delegation so that it could incorporate two corrigenda. This revised version also contains some proposals for additional amendments that were deemed necessary during the revision and have not yet been considered by the informal working group on the training of experts.

## I. Requests and rationale

7. Subsection 8.2.1.2 should be amended as follows:

In the second sentence, replace the words “*einer von dieser Behörde anerkannten Stelle*” with “*von einer von dieser Behörde anerkannten Stelle*” [German version only].

8. Subsection 8.2.1.4 should be amended as follows:

In the first sentence, replace “*einer von dieser Behörde anerkannten Stelle*” with “*eine von dieser Behörde anerkannte Stelle*” [German version only].

The third sentence should be amended to read “*Le test peut être répété deux fois pendant la durée de la validité de l’attestation*” [French and German versions only].

In the third sentence, replace “as often as desired” with “two times” [English version only].

Delete the last two sentences.

**For information***English version*

“After five years, the certificate shall be renewed by the competent authority or by a body recognized by it if the expert furnishes proof, of successful completion of a refresher course taken in the last year prior to the expiry of the certificate, covering at least the objectives referred to in 8.2.2.3.1.1 and in 8.2.2.3.1.2 or 8.2.2.3.1.3 and comprising current new developments in particular. A refresher course shall be considered to have been successfully completed if a final written test conducted by the course organizer under 8.2.2.2 has been passed. The test can be retaken ~~as often as desired~~ two times during the validity of the certificate. ~~The new period of validity shall begin on the expiry date of the certificate; if the test is passed more than one year before the date of expiry of the certificate, it shall begin on the date of the certificate of participation in the course.~~”

*French version*

« Après cinq ans, l’attestation est renouvelée par l’autorité compétente ou par un organisme agréé par elle si l’expert apporte la preuve qu’il a participé à un cours de recyclage et l’a validé avec succès durant la dernière année avant l’expiration de la validité de son attestation, ce cours traitant au moins les objectifs visés au 8.2.2.3.1.1 et au 8.2.2.3.1.2 ou 8.2.2.3.1.3 et comprenant en particulier les mises à jour d’actualité. Un cours de recyclage a été passé avec succès si un test final écrit réalisé par l’organisateur des cours selon 8.2.2.2 a été réussi. Le test peut être répété deux fois pendant la durée de la validité de l’attestation. ~~La nouvelle durée de validité commence à la date d’expiration de l’attestation. Si le test a été passé plus d’un an avant la date d’expiration de l’attestation, elle commence à la date de l’attestation de participation au cours.~~ »

*German version*

„Jeweils nach fünf Jahren wird die Bescheinigung durch die zuständige Behörde oder ~~einer von dieser Behörde anerkannten Stelle~~ eine von dieser Behörde anerkannte Stelle erneuert, wenn der Sachkundige nachweist, dass er innerhalb des letzten Jahres vor Ablauf der Gültigkeit seiner Bescheinigung mit Erfolg einen Wiederholungskurs durchlaufen hat, der auf die in Absatz 8.2.2.3.1.1 und die in Absatz 8.2.2.3.1.2 oder 8.2.2.3.1.3 genannten Prüfungsziele aufbaut und insbesondere Neuerungen enthält. Ein Wiederholungskurs wurde mit Erfolg durchlaufen, wenn ein vom Schulungsveranstalter nach 8.2.2.2 durchgeführter schriftlicher Abschlusstest bestanden wurde. ~~Er~~ Der Test kann innerhalb der Laufzeit der Bescheinigung zweimal wiederholt werden. ~~Die neue Geltungsdauer beginnt mit dem Ablaufdatum der Bescheinigung. Wenn der Abschlusstest mehr als ein Jahr vor Ablauf der Bescheinigung bestanden wurde, beginnt sie mit dem Datum der Teilnahmebescheinigung.~~“

**Rationale**

9. The change to the first sentence is a grammatical correction to the German [German version only].

10. In the third sentence, the current wording, “*Er kann ... wiederholt werden*” may be unclear, as it may also refer to the test set. The French and English versions clearly refer to the “test” and not to the “course” [German version only]. “As often as desired” should be replaced with “two times” [English version only]. At its thirty-first session, the ADN Safety Committee confirmed the interpretation of the informal working group on the training of experts according to which the final exam could be repeated only twice (see documents ECE/TRANS/WP.15/AC.2/2017/30, para. 17, and ECE/TRANS/WP.15/AC.2/62, para. 28).

11. The last two sentences have been deleted because only requirements relating to the content of the training and the successful completion of the training should be described here. Provisions relating to the issuance, the form and validity of certificates are grouped under 8.2.2.8.

12. Amend subsection 8.2.1.6 as follows:

Amend the first sentence to read:

After five years, the certificate shall be renewed by the competent authority or by a body recognized by it if the expert on the carriage of gases furnishes proof:

- That during the year preceding the expiry of the certificate, he has participated in a refresher course covering at least the objectives referred to in 8.2.2.3.3.1 and comprising current new developments in particular; or
- That during the previous two years he has performed a period of work of not less than one year on board a type G tank vessel.

Delete the second sentence.

### **For information**

#### *English version*

“After five years, the certificate shall be renewed by the competent authority or by a body recognized by it if the expert on the carriage of gases furnishes proof:

- That during the year preceding the expiry of the certificate, he has participated in a refresher ~~specialization~~ course covering at least the objectives referred to in 8.2.2.3.3.1 and comprising current new developments in particular; or
- That during the previous two years he has performed a period of work of not less than one year on board a type G tank vessel.

~~— When the refresher specialization training course is taken in the year preceding the date of expiry of the certificate, the new period of validity shall begin on the expiry date of the preceding certificate, but in other cases it shall begin on the date of certification of participation in the course.”~~

#### *French version*

« Après cinq ans, l’attestation est renouvelée par l’autorité compétente ou par un organisme agréé par elle si l’expert pour le transport de gaz apporte la preuve:

- Que durant la dernière année avant l’expiration de la validité de son attestation, il a participé à un cours de recyclage ~~et de spécialisation~~ traitant au moins les objectifs visés au 8.2.2.3.3.1 et comprenant en particulier les mises à jour d’actualité; ou
- Que durant les deux dernières années il a effectué un temps de travail d’un an au moins à bord d’un bateau-citerne du type G.

~~Lorsque le cours de recyclage et de spécialisation est suivi dans l’année qui précède la date d’expiration de la validité de l’attestation, la nouvelle durée de validité commence à la date d’expiration de l’attestation précédente, dans les autres cas elle commence à la date de l’attestation de participation au cours. »~~

#### *German version*

~~„Jeweils nach~~ Nach fünf Jahren wird die Bescheinigung durch die zuständige Behörde oder eine von dieser Behörde anerkannte Stelle erneuert, wenn der Sachkundige für die Beförderung von Gasen nachweist, dass er:

- innerhalb des letzten Jahres vor Ablauf der Gültigkeit seiner Bescheinigung mit Erfolg einen Wiederholungskurs durchlaufen hat, der ~~auf~~ mindestens die in Absatz 8.2.2.3.3.1 genannten Prüfungsziele ~~aufbaut~~ umfasst und insbesondere Neuerungen enthält, oder
- innerhalb der letzten zwei Jahre mindestens ein Jahr an Bord eines Tankschiffs des Typs G gearbeitet hat.

~~Wurde der Wiederholungskurs innerhalb des letzten Jahres vor Ablauf der Gültigkeit der Bescheinigung durchlaufen, beginnt die neue Geltungsdauer mit dem Ablaufdatum der Bescheinigung, in den übrigen Fällen ab Datum des Teilnahmenachweises.“~~

### **Rationale**

13. The word “*Jeweils*” at the beginning of the first sentence is to be deleted, as it has no corresponding word in the English and French versions. In the first indent of the first sentence, the wording relating to the content of the refresher course should be brought into line with the English and French versions. The wording according to which the course must

“cover” at least the contents of 8.2.2.3.3.1 is less rigorous and less accurate than the requirement according to which the refresher course “must include at least the following objectives”. In the first indent after “*Bescheinigung*”, the words “*mit Erfolg*” are to be deleted. According to ADN 8.2.2.7.3, provision is made for a final test capable of proving successful participation only for the refresher course required for renewal of the basic certificate (8.2.1.4) [German version only].

14. “Refresher specialization course” is to be replaced with “refresher course”. The addition of “specialization” may be confusing, as a refresher course is also required for the basic certificate. The term “refresher course” is used at the same time for both the basic training course and the specialization course: ADN 8.2.2.3.2 and 8.2.2.3.4 [English and French versions only].

15. The second sentence has been deleted because only requirements relating to the content of the training and the successful completion of the training should be described here. Provisions relating to the issuance, form and validity period of certificates are grouped under 8.2.2.8.

16. Amend subsection 8.2.1.8 as follows:

Amend the first sentence to read:

“After five years, the certificate shall be renewed by the competent authority or by a body recognized by it if the expert on the carriage of chemicals furnishes proof:;

- That during the year preceding the expiry of the certificate, he has participated in a refresher course covering at least the objectives referred to in 8.2.2.3.3.2 and comprising current new developments in particular; or
- That during the previous two years he had performed a period of work of not less than one year on board a type C tank vessel.

Delete the second sentence.

### **For information**

#### *English version*

“After five years, the certificate shall be renewed by the competent authority or by a body recognized by it if the expert on the carriage of chemicals furnishes proof:;

- That during the year preceding the expiry of the certificate, he has participated in a refresher ~~specialization~~ course covering at least the objectives referred to in 8.2.2.3.3.2 and comprising current new developments in particular; or
- That during the previous two years he had performed a period of work of not less than one year on board a type C tank vessel.

~~“When the refresher specialization training course is taken in the year preceding the date of expiry of the certificate, the new period of validity shall begin on the expiry date of the preceding certificate, but in other cases it shall begin on the date of certification of participation in the course.”~~

#### *French version*

« Après cinq ans, l’attestation est renouvelée par l’autorité compétente ou par un organisme agréé par elle si l’expert pour le transport de produits chimiques apporte la preuve:

- Que durant la dernière année avant l’expiration de la validité de son attestation, il a participé à un cours de recyclage ~~et de spécialisation~~ traitant au moins les objectifs visés au 8.2.2.3.3.2 et comprenant en particulier les mises à jour d’actualité; ou
- Que durant les deux dernières années il a effectué un temps de travail d’un an au moins à bord d’un bateau-citerne du type C.

~~Lorsque le cours de recyclage et de spécialisation est suivi dans l’année qui précède la date d’expiration de la validité de l’attestation, la nouvelle durée de validité commence à la date d’expiration de l’attestation précédente, dans les autres cas elle commence à la date de l’attestation de participation au cours. »~~

*German version*

~~„Jeweils nach~~ Nach fünf Jahren wird die Bescheinigung durch die zuständige Behörde oder eine von dieser Behörde anerkannte Stelle erneuert, wenn der Sachkundige für die Beförderung von Chemikalien nachweist, dass er:

- Innerhalb des letzten Jahres vor Ablauf der Gültigkeit seiner Bescheinigung ~~mit Erfolg~~ einen Wiederholungskurs durchlaufen hat, der ~~auf~~ mindestens die in Absatz 8.2.2.3.3.2 genannten Prüfungsziele ~~aufbaut~~ umfasst und insbesondere Neuerungen enthält, oder
- Innerhalb der letzten zwei Jahre mindestens ein Jahr an Bord eines Tankschiffs des Typs C gearbeitet hat.

~~Wurde der Wiederholungskurs innerhalb des letzten Jahres vor Ablauf der Gültigkeit der Bescheinigung durchlaufen, beginnt die neue Geltungsdauer mit dem Ablaufdatum der Bescheinigung, in den übrigen Fällen ab Datum des Teilnahmenachweises.“~~

**Rationale**

17. The word “*Jeweils*” at the beginning of the first sentence is to be deleted, as it has no corresponding word in the English and French versions. In the first indent of the first sentence, the wording relating to the content of the refresher course should be brought into line with the English and French versions. The wording according to which the course must “cover” at least the contents of 8.2.2.3.3.1 is less rigorous and less accurate than the requirement according to which the refresher course “must include at least the following objectives”. In the first indent after “*Bescheinigung*”, the words “*mit Erfolg*” are to be deleted. According to ADN 8.2.2.7.3, provision is made for a final test capable of proving successful participation only for the refresher course required for renewal of the basic certificate (8.2.1.4) [German version only].

18. “Refresher specialization course” is to be replaced with “refresher course”. The addition of “specialization” may be confusing, as a refresher course is also required for the basic certificate. The term “refresher course” is used at the same time for both the basic training course and the specialization course: ADN 8.2.2.3.2 and 8.2.2.3.4 [English and French versions only].

19. The second sentence has been deleted because only requirements relating to the content of the training and the successful completion of the training should be described here. Provisions relating to the issuance, form and validity period of certificates are grouped under 8.2.2.8.

20. Amend subsection 8.2.1.9 to read as follows:

“8.2.1.9 The document attesting training and experience in accordance with the requirements of Chapter V of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers of 7 July 1978 (STCW Convention) on liquefied gas tankers shall be equivalent to the certificate referred to in 8.2.1.5, provided it has been recognized by a competent authority. No more than five years shall have passed since the date of issue or renewal of such a document.”

**For information**

“8.2.1.9 The document attesting training and experience in accordance with the requirements of Chapter V of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers of 7 July 1978 (STCW Convention) ~~STCW Code on Training and Qualifications of Masters, Officers and Ratings of Tankers~~ on liquefied gas tankers ~~carrying LPG/LNG~~ shall be equivalent to the certificate referred to in 8.2.1.5, provided it has been recognized by a competent authority. No more than five years shall have passed since the date of issue or renewal of such a document.”

**Rationale**

21. The reference to the Convention should be made clear. Chapter V of the STCW Convention generally provides for training for “liquefied gas tanker cargo operations”. No distinction is made between LPG, LNG or liquefied hydrocarbons.

22. Amend subsection 8.2.1.10 to read as follows:

“8.2.1.10 The document attesting training and experience in accordance with Chapter V of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers of 7 July 1978 (STCW Convention) on chemical tankers shall be equivalent to the certificate referred to in 8.2.1.7, provided it has been recognized by a competent authority. No more than five years shall have passed since the date of issue or renewal of such a document.”

**For information**

“8.2.1.10 The document attesting training and experience in accordance with Chapter V of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers of 7 July 1978 (STCW Convention) on chemical tankers ~~STCW Code on Training and Qualifications of Masters, Officers and Ratings of Tankers carrying chemicals~~ shall be equivalent to the certificate referred to in 8.2.1.7, provided it has been recognized by a competent authority. No more than five years shall have passed since the date of issue or renewal of such a document.”

23. The reference to the Convention should be made clear.

24. Amend subsection 8.2.1.11 to read as follows:

“8.2.1.11 (deleted)”.

**Rationale**

25. Requirements relating to the issuance, form and validity period of the certificate are grouped under subsection 8.2.2.8.

26. Amend subsection 8.2.2.8 to read as follows:

**“8.2.2.8 ADN specialized knowledge certificate**

“8.2.2.8.1 The issue and renewal of the ADN specialized knowledge certificate conforming to the model in section 8.6.2 shall be the responsibility of the competent authority or a body authorized by such authority.”

**Rationale**

27. To improve readability, the current 8.2.2.8.1 is divided into several numbered subparagraphs. The words “conforming to the model” are inserted by analogy with the precise wording of ADN 1.16.1.2.1, for certificates of approval.

28. “8.2.2.8.2 The certificate’s dimensions shall be in accordance with ISO/IEC 7810:2003, card size ID-1, and it shall be made of plastic. The colour shall be white, with black lettering. The certificate shall include an additional security feature such as a hologram, UV printing or engraved patterns. Its text shall be in the language(s) or in one of the languages of the State whose competent authority has issued it. If none of these languages is English, French or German, the title of the certificate, the title of item 8 and the titles on the back, and if applicable the additions under “tank vessels” or “dry cargo vessels” shall also be drawn up in English, French or German.”

**Rationale**

29. The Safety Committee already expressed its support for changing over from the A6 format to the smaller, card format. The text has been taken from ADR 8.2.2.8.3 and 8.2.2.8.4 and has been adapted to the specificities of ADN.

30. It is proposed to dispense with the use of the colour orange for the background so as to facilitate and lower the cost of production of certificates.

“8.2.2.8.3 Certificates shall be issued to:

(a) Candidates who have met the conditions of the second sentence of subsection 8.2.1.2 and subsection 8.2.1.3 (basic training course); they shall be valid for five years from the date when the examination has been passed following basic training;

(b) Candidates who meet the conditions of subsection 8.2.1.5 or of subsection 8.2.1.7 (“gas” or “chemicals” specialization course); in this case, a new certificate shall be issued containing certificates for the basic training and specialization courses. The new certificate to be issued shall be valid for five years from the date when the examination has been passed following basic training.

#### **Rationale**

31. This new paragraph takes up provisions existing in the current ADN 8.2.2.8.1, with improved and clearer wording.

32. In subparagraph (a) the expression “from the date when the examination has been passed following basic training” is used instead of “from the date of the basic training examination”, used in the fifth sentence in 8.2.2.8.1, of ADN 2017. This makes it clearer that it is necessary to pass the examination in order to obtain the certificate.

33. Contrary to ADN 2017, in subparagraph (b), the need to have worked on board a vessel for a certain time in order to obtain the certificate is taken into consideration.

“8.2.2.8.4 The certificate shall be renewed:

(a) When the proof required under subsection 8.2.1.4 is provided (basic training; the new duration of validity shall begin on the expiry date of the previous certificate. If the examination has been taken more than one year before the certificate’s expiry date, it shall begin on the date of the certificate of participation in the course;

(b) When the proof required under subsections 8.2.1.6 and 8.2.1.8 are provided (“gas” or “chemicals” specialization courses). In this case, a new certificate containing all the certificates relating to the basic training and specialization courses shall be issued. The new certificate to be issued shall have a period of validity of five years from the date of the successfully completed refresher course for basic training. When the refresher specialization course is taken in the year before the certificate’s expiry date, the new period of validity shall begin on the expiry date of the previous certificate; otherwise it shall begin on the date of the certificate of participation in the course.”

#### **Rationale**

34. Current subsection 8.2.2.8 of ADN 2017 does not give the conditions for renewal of certificates, notwithstanding the fact that the first sentence refers to “issue and renewal”.

35. Subparagraph (a) now contains the provisions regarding the beginning of the period of validity that appear in ADN 2017 subsection 8.2.1.4.

36. Subparagraph (b) now contains the provisions regarding the beginning of the period of validity that appear in ADN 2017 subsections 8.2.1.6 and 8.2.1.8.

37. “8.2.2.8.5 If the refresher course for the renewal of the certificate has not been fully and successfully completed before the expiry of the period of validity of the certificate, or if the work on board a vessel for one year has not been certified during the two years preceding the certificate’s expiry, a new certificate shall be issued, for which participation in a further initial basic training course and an examination in accordance with 8.2.2.7 shall be required.”

#### **Rationale**

38. Formerly, the fifth indent of ADN 8.2.2.8.1.

“8.2.2.8.6 If a new certificate is issued in accordance with 8.2.2.8.3 (b) or a certificate is renewed in accordance with 8.2.2.8.4 and the previous certificate had been issued by another authority or by a body authorized to do so by such an authority, the issuing authority or body approved by that authority that has issued the previous certificate shall be informed without delay.”

#### **Rationale**

39. Formerly, the sixth indent of ADN 8.2.2.8.1.

40. In the view of the experts in the informal working group on the training of experts, physically handing in the original certificate to the issuing authority after renewal is no longer necessary and is difficult to implement internationally from the administrative point of view. It would seem that it would suffice to destroy the original certificate and to change the issuing date in the register kept in accordance with ADN 1.10.1.6. The authorities of the Contracting Parties can obtain information from these registers.

“8.2.2.8.7 The Contracting Parties shall provide the UNECE secretariat with a model for any certificate intended for issue in accordance with this section, along with models of certificates which are still valid. The Contracting Parties may additionally provide explanatory notes. The UNECE secretariat shall make the information it receives available to all Contracting Parties.”

### Rationale

41. Formerly ADN 8.2.2.8.2.

42. Amend ADN section 8.6.2 to read as follows:

### “8.6.2 Certificate of special knowledge of ADN according to 8.2.1.2, 8.2.1.5 or 8.2.1.7

#### *(Recto)*

(**)	
Certificate of special knowledge of ADN	
1. (No. of certificate)	
2. (Name)	
3. (First name(s))	
4. (Born on DD/MM/YYYY)	
5. (Nationality)	
6. (Signature of holder)	
7. (Issued by)	
8. VALID UNTIL: (DD/MM/YYYY)	
	Photo of holder

#### *(Verso)*

1. (No. of certificate)
The certificate is valid for special knowledge of ADN according to:
(Insert the corresponding subsection of ADN 8.2.1, if applicable with the mention “only for dry cargo vessels” or “only for tank vessels”.)

\*\* Letter code(s) used for international navigation (CEVNI – Annex 1).”

### Rationale

43. The model certificate corresponds with those for the Rhine licences and for driver training certificates under ADR (ADR 8.2.2.8.5).

44. The text reading “The holder of this certificate has participated in an 8-lesson stability training” is no longer useful because with the deadline proposed for the introduction of the new certificate, all experts will have taken part in the training course.

45. Amend transitional requirement ADN 1.6.8 as follows:

- (a) The existing text becomes subsection 1.6.8.1;

(b) Insert the following new subsection:

“1.6.8.2 Instead of issuing certificates of special knowledge of ADN in accordance with 8.2.2.8.2 and section 8.6.2, the Contracting Parties may, until 31 December 2018, issue certificates according to the model applicable until 31 December 2018. Such certificates shall be valid until the expiry of their validity of five years.”

#### **Rationale**

46. As in the case of ADR 2011 subsection 1.6.1.21, when documentation certifying driver training was introduced in this format. This solution has been proven effective for driver training.

### **III. Safety**

47. ADN 8.2.2.8.1, which is extremely lengthy and contains several independent provisions, is set out more clearly. The conditions for issuing the certificate are also worded more clearly. Previously, only the first issuance of the certificate had been described. The conditions for renewal of certificates is thus set out more clearly and accurately from the legal standpoint. This will make it possible to a large extent to avoid procedural errors that might call into question the validity of the certificates.

48. The new format adopted by ADR and the Regulations for Rhine Navigation Personnel provide better protection against forgery and thus help improve transport safety, as only experts recognized by the authorities and the driver, as the person with primary responsibility, are engaged in transport operations. Requirements relating to the identification of certificate holders, as set out in Chapter 1.10, entitled “Security provisions”, are taken into consideration with the addition of an identification photograph.

### **IV. Implementation**

49. For the most part, the proposed amendments will require no action on the part of professionals or the competent authorities, as they consist of editorial or linguistic improvements.

50. The amendments to ADN subsections 8.2.1.4 and 8.2.1.6 regarding the refresher course and the final examination might result in changes to the way in which training bodies are organized, but such changes would require no investments and should not be very time consuming.

51. The new format proposed for the certificate is described in an ISO standard, so its issuance by State agencies or private bodies, which also issue other identification documents, should pose no problem. Dispensing with the use of the colour orange for the background of the expert’s certificate eliminates a possible technical constraint.

52. The proposed format has shown its worth in the framework of ADR. Cards can be issued by the competent authorities in a decentralized manner, on site, or through a national centre. If the processing is decentralized, the certificates can be produced immediately once the examination has been passed. If longer production times are required for issuance by a national centre, candidates can take the additional lag time into account when planning the dates of their examinations.

53. The fact that the certificates’ production is more complex might lead to higher costs for their issuance. This would seem justified, taking into account the advantages in terms of safety.

### **V. Notes**

54. Additional amendments to Chapter 8.2, subsection 8.2.2.3 have been approved for ADN 2019, on the basis of the following documents:

ECE/TRANS/WP.15/AC.2/2017/21 : 8.2.2.3.1.1 and 8.2.2.3.1.3.

ECE/TRANS/WP.15/AC.2/2017/47 : 8.2.2.3.1.3, 8.2.2.3.3.1 and 8.2.2.3.3.2.

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