ECONOMIC COMMISSION FOR EUROPE INLAND TRANSPORT COMMITTEE

INF.39

Working Party on the transport of dangerous goods

Joint Meeting of the RID Safety Committee and the Working Party on the Transport of Dangerous Goods

(Bern, March 2003)

1.8.3 SAFETY ADVISER

Comments to Belgium proposals in INF.23

Transmitted by the Government of France

The French delegation thanks the Belgian delegation for the work on the safety advisor refresher training.

Nevertheless we would like to make following comments and propose some modifications or additions

1) <u>Duration of training:</u>

The different options are not consistent with the comprehensive training. For instance, the duration of a training limited to 2 classes, for only one mode is 30 hours which is more than the 24 hours of the comprehensive training.

We think that the training duration does not automatically vary in a proportional way.

Because of the different options to consider, it is easier to divide the training course in modules, with a base module and different specialised modules that would be simply added for each additional mode and specialization.

The requirements should also be drafted in a way that can be split in each modal regulation because ADR for instance can not specify the requirements for inland waterways.

Proposal:

"1.8.3.16.3 the different modules and their duration could be as follows:

■ Base module: 12 hours

• Class 1 : 4 hours

Class 2: 4 hours

Class 7: 4 hoursClass 3 / 9: 4 hours

• ONU 1202, 1203, 1223 : 3 hours

Road : 3 hoursRail : 3 hours

o Inland Waterway: 6 hours"

Examples:

• All classes / All modes : 12 + (4x4)+3+3+6 = 40 hours

• ONU 1202,1203,1223 / Road : 12 + 3 + 3 = 18 hours

• Class 3/9 - Road + Rail : 12 + 3 + 3 + 4 = 22 hours

2) Examination:

We think that safety advisor that are in activity for several years should be given the opportunity to be considered differently than certificate beholder that haven't worked in the field of transport of dangerous goods:

Add the following paragraph:

"1.8.3.16.6 For safety advisors who have been in uninterrupted activity during three years, before the expiry date of their certificate, the Competent Authority may organise an oral examination. The activity should be prove by the presentation of employments contracts. The oral examination, shall relate to the three annual reports and verify the up to date knowledge of the candidate."

3) Approval of training:

The approval procedure shall be described as for the drivers training in 8.2.2.6.

Add the following text:

"1.8.3.17 Approval of training

- 1.8.3.17.1 The training courses shall be subject to approval by the competent authority.
- 1.8.3.17.2 Approval shall only be given with regard to applications submitted in writing.
- 1.8.3.17.3 The following documents shall be attached to the application for approval:
 - (a) A detailed training programme specifying the subjects taught and indicating the time schedule and planned teaching methods;
 - (b) Qualifications and fields of activities of the teaching personnel. Teaching personal shall at least behold a safety advisor certificate, those extension shall only be guaranteed on the basis of an examination;
 - (c) Information on the premises where the courses take place and on the teaching materials as well as on the facilities for the practical exercises;
 - (d) Conditions of participation in the courses, such as number of participants.

- 1.8.3.17.4 The competent authority shall organize the supervision of training.
- 1.8.3.17.5 Approval shall be granted in writing by the competent authority subject to the following conditions:
 - (a) The training shall be given in conformity with the application documents;
 - (b) The competent authority shall be granted the right to send authorized persons to be present at the training courses and examinations;
 - (c) The competent authority shall be advised in time of the dates and the places of the individual training courses;
 - (d) The approval may be withdrawn if the conditions of approval are not complied with.
- 1.8.3.17.6 If the training body, after a training course has been given approval, intends to make any alterations with respect to such details as were relevant to the approval, it shall seek permission in advance from the competent authority. This applies in particular to changes concerning the training programme. "

Consequential amendment

Renumber current 1.8.3.17 as 1.8.3.18, etc...