
ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

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PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Sections 8.2.1 and 8.2.2: Driver training

Comments of Belgium to ECE/TRANS/WP.15/2009/4 of the United Kingdom

1. Adding the words “*other than in tanks*” in the first line of 8.2.1.2 (“*Drivers of vehicles carrying dangerous goods other than in tanks shall attend a basic training course.*”) seems to indicate that the other drivers, who carry the dangerous goods in tanks, need not. This of course is not true, and is in contradiction with “*This training ... shall act as the basis of training for all categories of drivers*”. This confusing addition is better eliminated.
2. The wording of the proposed 8.2.1.5 is very unfortunate (“*Every five years a vehicle driver shall be able to show that he has in the year before the date of expiry of his certificate completed refresher training and has passed a corresponding examination*”). A vehicle driver need not to complete refresher training and pass a corresponding examination every five years (he can attend a basic training course every five years if he prefers to do so). Moreover, it is this paragraph that provides the maximum period of validity of the certificate, but only in a very unclear an indirect manner.

This can be remedied by changing 8.2.1.5 as follows :

8.2.1.5 *When a vehicle driver is able to show that he has, in the year before the date of expiry of his certificate, completed refresher training and has passed a corresponding examination, the competent authority shall issue a new certificate, the period of validity of which shall begin with the date of expiry of the previous certificate.*

and adding a new 8.2.2.8.2 :

8.2.2.8.2 *The period of validity of the certificate expires five years after the date of the examination or the earliest of the examinations in accordance with 8.2.2.8.1.*

3. In 8.2.1.9, the wording “*or by any recognized organization*” is too general, as it includes organizations recognized by other competent authorities. This could be remedied as follows : “*or by any organization it has recognized to this effect*”.

4. The introduction of a plastic certificate with a photograph and a hologram (or something similar) will create serious problems for the drivers and the carriers, due to the much longer period of time needed for its production (it takes several weeks to deliver the comparable Belgian identity card).

It might be argued that this problem can be avoided at renewal by simply not waiting until the last weeks of validity of the certificate, but in the very frequent case of delivering a duplicate for a stolen or lost certificate this delay can have far-reaching consequences (certainly for small companies with a limited number of drivers).

The possible advantages do not outweigh this disadvantage (and the much higher cost) :

- every driver is already now in the possession of at least one document with his photograph (his diver licence), and in international transport every member of the crew has to carry his passport or identity card ; therefore there is no need to introduce yet another document with a photograph to fulfill the requirement in 1.10.1.4 (not all crew members are required to be in the possession of an ADR driver certificate anyway) ;
- forgeries of diver certificates are rare, and with the introduction of the requirement to keep registers of all valid certificates (the new 8.2.1.9) it will become easy to detect them.

For the reasons set out above, it is proposed not to change the model of the certificate.
