

**Economic Commission for Europe**

**Inland Transport Committee**

**Working Party on the Transport of Dangerous Goods**

24 September 2010

**Eighty-ninth session**

Geneva, 26–29 October 2010

Item 3 of the provisional agenda

**Interpretation of ADR**

**Interpretation of training of drivers involved in a sea transport**

**Transmitted by the Government of Sweden**

1. The IMDG-Code now regulates training for shore-based personnel that are engaged in the transport of dangerous goods by sea. One of the groups referred to in Section 1.3.1 in the IMDG-Code is personnel that carry dangerous goods in transport (see enclosed extract from the IMDG-Code). For this group a recommended training is set up that shows specific training requirements.
2. Drivers of vehicles carrying dangerous goods seem to be concerned by this requirement in IMDG-Code since they sometime carry dangerous goods to Ro-Ro ships. In fact when drivers run their vehicles to a Ro-Ro ship it seems that they need an extra training in addition to that mentioned in Chapter 8.2 in ADR.
3. Therefore, Sweden would like to know the opinion of the meeting whether this is a correct interpretation, and if so, should ADR refer to Section 1.3.1 in the IMDG-Code to facilitate for drivers to get the correct training before entering a Ro-Ro ship.

## Chapter 1.1

### *General provisions*

#### 1.1.0 Introductory note

It should be noted that other international and national modal regulations exist and that those regulations may recognize all or part of the provisions of this Code. In addition, port authorities and other bodies and organizations should recognize the Code and may use it as a basis for their storage and handling bye-laws within loading and discharge areas.

#### 1.1.1 Application and implementation of the Code

1.1.1.1 The provisions contained in this Code are applicable to all ships to which the International Convention for the Safety of Life at Sea, 1974 (SOLAS 74), as amended, applies and which are carrying dangerous goods as defined in regulation 1 of part A of chapter VII of that Convention.

1.1.1.2 The provisions of regulation II-2/19 of that Convention apply to passenger ships and to cargo ships constructed on or after 1 July 2002.

For:

- .1 a passenger ship constructed on or after 1 September 1984 but before 1 July 2002; or
- .2 a cargo ship of 500 gross tons or over constructed on or after 1 September 1984 but before 1 July 2002; or
- .3 a cargo ship of less than 500 gross tons constructed on or after 1 February 1992 but before 1 July 2002,

the requirements of regulation II-2/54 of SOLAS, 1974, as amended by resolutions MSC.1(XLV), MSC.6(48), MSC.13(57), MSC.22(59), MSC.24(60), MSC.27(61), MSC.31(63) and MSC.57(67), apply (see II-2/1.2).

For cargo ships of less than 500 gross tons constructed on or after 1 September 1984 and before 1 February 1992, it is recommended that Contracting Governments extend such application to these cargo ships as far as possible.

1.1.1.3 All ships, irrespective of type and size, carrying substances, material or articles identified in this Code as marine pollutants are subject to the provisions of this Code.

1.1.1.4 In certain parts of this Code, a particular action is prescribed, but the responsibility for carrying out the action is not specifically assigned to any particular person. Such responsibility may vary according to the laws and customs of different countries and the international conventions into which these countries have entered. For the purpose of this Code, it is not necessary to make this assignment, but only to identify the action itself. It remains the prerogative of each Government to assign this responsibility.

1.1.1.5 Although this Code is legally treated as a mandatory instrument under chapter VII of SOLAS 74, as amended, the following provisions of the Code remain recommendatory:

- .1 paragraphs 1.3.1.4 to 1.3.1.7 (Training);
- .2 chapter 1.4 (Security provisions) except 1.4.1.1, which is mandatory;
- .3 section 2.1.0 of chapter 2.1 (class 1 – explosives, Introductory notes);
- .4 section 2.3.3 of chapter 2.3 (Determination of flashpoint);
- .5 columns (15) and (17) of the Dangerous Goods List in chapter 3.2;
- .6 section 5.4.5 of chapter 5.4 (Multimodal Dangerous Goods Form), insofar as the layout of the form is concerned;
- .7 chapter 7.3 (Special provisions in the event of an incident and fire precautions involving dangerous goods only);
- .8 section 7.9.3 (Contact information for the main designated national competent authorities); and
- .9 appendix B.

## Chapter 1.3

### Training

#### 1.3.0 Introductory note

The successful application of regulations concerning the transport of dangerous goods and the achievement of their objectives are greatly dependent on the appreciation by all persons concerned of the risks involved and on a detailed understanding of the regulations. This can only be achieved by properly planned and maintained initial and retraining programmes for all persons concerned with the transport of dangerous goods. The provisions of paragraphs 1.3.1.4 to 1.3.1.7 remain recommendatory (see 1.1.1.5).

#### 1.3.1 Training of shore-side personnel

1.3.1.1 Shore-based personnel\* engaged in the transport of dangerous goods intended to be transported by sea shall receive training in the contents of dangerous goods provisions commensurate with their responsibilities. Training requirements specific to security of dangerous goods in chapter 1.4 shall also be addressed.

Entities engaging shore-based personnel in such activities shall determine which staff will be trained, what levels of training they require and the training methods used to enable them to comply with the provisions of the IMDG Code. This training shall be provided or verified upon employment in a position involving dangerous goods transport. For personnel who have not yet received the required training, the entities shall ensure that those personnel may only perform functions under the direct supervision of a trained person. The training shall be periodically supplemented with refresher training to take account of changes in regulations and practice. The competent authority, or its authorized body, may audit the entity to verify the effectiveness of the system in place, in providing training of staff commensurate with their role and responsibilities in the transport chain.

1.3.1.2 Shore-based personnel such as those who:

- classify dangerous goods and identify Proper Shipping Names of dangerous goods;
- pack dangerous goods;
- mark, label or placard dangerous goods;
- load/unload Cargo Transport Units;
- prepare transport documents for dangerous goods;
- offer dangerous goods for transport;
- accept dangerous goods for transport;
- handle dangerous goods in transport;
- prepare dangerous goods loading/stowage plans;
- load/unload dangerous goods into/from ships;
- carry dangerous goods in transport;
- enforce or survey or inspect for compliance with applicable rules and regulations; or
- are otherwise involved in the transport of dangerous goods as determined by the competent authority

shall receive the following training:

1.3.1.2.1 *General awareness/familiarization training:*

- .1 each person shall receive training designed to provide familiarity with the general provisions of dangerous goods transport provisions;

\* For the training of officers and ratings responsible for cargo handling on ships carrying dangerous and hazardous substances in solid form in bulk, or in packaged form, see the STCW Code, as amended.



- .2 such training shall include a description of the classes of dangerous goods; labelling, marking, placarding, packing, stowage, segregation and compatibility provisions; a description of the purpose and content of the dangerous goods transport documents (such as the Multimodal Dangerous Goods Form and the Container/Vehicle Packing Certificate); and a description of available emergency response documents.
- 1.3.1.2.2 *Function-specific training:* Each person shall receive detailed training concerning specific dangerous goods transport provisions which are applicable to the function that person performs. An indicative list, for guidance purposes only, of some of the functions typically found in dangerous goods transport operations by sea and training requirements is given in paragraph 1.3.1.6.
- 1.3.1.3 Details of all the training undertaken shall be kept by both the employer and the employee. Training records shall be made available to the competent authority if requested.
- 1.3.1.4 *Safety training:* Commensurate with the risk of exposure in the event of a release and the functions performed, each person should receive training on:
  - .1 methods and procedures for accident avoidance, such as proper use of package-handling equipment and appropriate methods of stowage of dangerous goods;
  - .2 available emergency response information and how to use it;
  - .3 general dangers presented by the various classes of dangerous goods and how to prevent exposure to those hazards, including, if appropriate, the use of personal protective clothing and equipment; and
  - .4 immediate procedures to be followed in the event of an unintentional release of dangerous goods, including any emergency response procedures for which the person is responsible and personal protection procedures to be followed.
- 1.3.1.5 **Recommended training needs for shore-side personnel involved in the transport of dangerous goods under the IMDG Code**

The following indicative table is for information purposes only as every entity is arranged differently and may have varied roles and responsibilities within that entity.

Function	Specific training requirements	Numbers in this column refer to the list of related codes and publications in 1.3.1.7
1 Classify dangerous goods and identify Proper Shipping Name	Classification requirements, in particular <ul style="list-style-type: none"> <li>- the structure of the description of substances</li> <li>- the classes of dangerous goods and the principles of their classification</li> <li>- the nature of the dangerous substances and articles transported (their physical, chemical and toxicological properties)</li> <li>- the procedure for classifying solutions and mixtures</li> <li>- identification by Proper Shipping Name</li> <li>- use of Dangerous Goods List</li> </ul>	.1, .4, .5 and .12
2 Pack dangerous goods	Classes Packaging requirements <ul style="list-style-type: none"> <li>- type of packages (IBC, large packaging, tank container and bulk container)</li> <li>- UN marking for approved packagings</li> <li>- segregation requirements</li> <li>- limited quantities and excepted quantities</li> </ul> Marking and labelling First aid measures Emergency response procedures Safe handling procedures	.1 and .4
3 Mark, label or placard dangerous goods	Classes Marking, labelling and placarding requirements <ul style="list-style-type: none"> <li>- primary and subsidiary risk labels</li> <li>- marine pollutants</li> <li>- limited quantities and excepted quantities</li> </ul>	.1