



Economic and Social Council

Distr.: General
8 February 2011

Original: English

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Ninetieth session

Geneva, 2–6 May 2010

Item 4 of the provisional agenda

Interpretation of ADR

Interpretation of the general training requirements of Chapter 1.3 with regard to 1.8.3 and Chapter 8.2

Transmitted by the Government of the United Kingdom¹

1. The notes under section 1.3.1 of ADR "Scope and applicability" of the training of persons involved in the carriage of dangerous goods, refer to specific training requirements contained elsewhere within ADR such as the training of the safety adviser and the training of the vehicle crew.

2. The United Kingdom has become aware that there is confusion among industry over the interpretation of this text. The text contained in Note 1 and Note 2 of this section is interpreted by some to mean that the training requirements of Chapter 1.3 do not apply if training is undertaken under the requirements of 1.8.3 or Chapter 8.2. However, it is the interpretation of others that the requirements of 1.8.3 and Chapter 8.2 are in addition to those of Chapter 1.3.

3. The requirements for training specifically relating to security and Class 7 are more clearly presented as additional requirements to Chapter 1.3 as in 1.3.1 it is clearly stated that:

"Training requirements specific to security of dangerous goods in Chapter 1.10 shall also be addressed.". (last sentence)

"For training with regard to Class 7, see also 1.7.2.5.". (Note 3)

¹ The present document is submitted in accordance with paragraph 1 (f) of the terms of reference of the Working Party, as contained in document ECE/TRANS/WP.15/190/Add.1, which provides a mandate to "discuss and resolve problems relating to the interpretation and enforcement of the European Agreement concerning the International Carriage of Dangerous Goods by Road (ADR)".

4. Furthermore, the last sentence of 8.2.3 implies that training in accordance with Chapter 1.3 is not applicable to drivers holding a certificate in accordance with 8.2.1:

"8.2.3 ...This requirement shall apply to individuals such as ... drivers of vehicles other than drivers holding a certificate in accordance with 8.2.1."

5. The United Kingdom would like to know the view of the Working Party on the interpretation of the text contained in 1.3.1 of ADR.

6. The United Kingdom would also like to know whether the Working Party believes that Note 4 of 1.3.1 "The training shall be effected before taking on responsibilities concerning the carriage of dangerous goods." is still necessary given that the text it contains is already contained within the main body of paragraph 1.3.1.

7. If it is felt that the text of 1.3.1 and 8.2.3 could be made clearer with regard to these two queries then the United Kingdom would be prepared to submit a proposal for the next session.
