

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Interpretation of ADR

3 October 2012

Training of persons involved in the carriage of dangerous goods (Chapter 1.3 of ADR)

Transmitted by the Government of Germany

Introduction

1. At its 91st session in November 2011, WP.15 adopted the following amendments to section 1.3.1 of ADR (ECE/TRANS/WP.15/212, No. 45):

1.3.1.1

(...)

NOTE 1: With regard to the training for the safety adviser, see 1.8.3 instead of this section.

NOTE 2: With regard to the training of the vehicle crew, see Chapter 8.2 instead of this section.

NOTE 3: (.....)

NOTE 4:(deleted)

2. It was felt that Chapter 1.3 does not apply to persons who are already being trained in accordance with Chapter 8.2 (training of drivers) insofar and as long as they are acting in their role as driver. It was stated that the provisions there contained more detailed training requirements for this role than the general training provisions in Chapter 1.3. Drivers of dangerous goods vehicles should only receive training in accordance with Chapter 1.3 if they fulfilled roles other than that of the driver in their company.

3. In accordance with sub-paragraph 1.10.2.1 of ADR, the training prescribed in Chapter 1.3 of ADR, however, has to include elements of security awareness. Pursuant to sub-paragraph 1.10.2.2 of ADR, this also includes imparting knowledge of potential security plans in accordance with 1.10.3.2 of ADR and of the role of the driver in implementing these plans.

4. Security plans in accordance with 1.10.3.2 of ADR are usually prepared for an individual transport operation and should be treated confidentially and used only internally within the company so that information on carried particularly dangerous goods cannot fall into the wrong hands and be misused.

5. With the amendment of paragraph 1.3.1 of ADR, the training of the drivers regarding their role within the framework of the security plans has now been transferred to the training bodies that carry out the training in accordance with Chapter 8.2 of ADR. A new training subject – “(o) security awareness” – was already included in ADR 2011 in paragraph 8.2.2.3.2.

6. The German delegation would be grateful to receive information from the other delegations as to how their countries intend to practically integrate driver training in accordance with Section 1.10.2 of ADR into the training of drivers in accordance with Chapter 8.2 of ADR.

7. Germany considers it problematic that the training courses within the framework of Chapter 8.2 of ADR are attended by many different drivers from different carriers while the security plans have to be prepared individually for every transport operation of the different carriers. The question is how the training bodies acquire knowledge of the many individual security plans so as to be able to transfer knowledge in accordance with 1.10.2.2 of ADR to every driver attending the course regarding his role in implementing a specific security plan. Moreover, the discussion of security plans in the large circle of participants of a training course in accordance with Chapter 8.2 of ADR would result in these plans becoming public knowledge. The German delegation is of the opinion that this would be contrary to the purpose of the security plans, which is to prevent the misuse of certain carried dangerous goods.
