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## COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS AND ON THE GLOBALLY HARMONIZED SYSTEM OF CLASSIFICATION AND LABELLING OF CHEMICALS

Sub-Committee of Experts on the  
Transport of Dangerous Goods

Thirty-first session  
Geneva, 2-6 July 2007  
Item 6 of the provisional agenda

### MISCELLANEOUS PROPOSALS OF AMENDMENTS TO THE MODEL REGULATIONS ON THE TRANSPORT OF DANGEROUS GOODS

Comments on paper ST/SG/AC.10/C.3/2007/7

Provisions concerning training

Transmitted by the Council on Safe Transportation of Hazardous Articles, Inc. (COSTHA)

In paper ST/SG/AC.10/C.3/2007/07 the Expert from Sweden proposes to clarify the training requirements specified in section 1.3.1, 1.3.2 and 1.5.2.7 of the UN Recommendation. COSTHA recognizes the concerns raised by the Expert from Sweden, and we agree that the mandatory training requirements must be enforceable. However we would like to express our concerns regarding some specific parts of the proposal.

#### **Comments**

COSTHA believes the proposal as written could severely hinder the employment of individuals who seek a job in entering the dangerous goods field and could unduly restrict companies who have a need to fill a vacancy because of an unexpected emergency or work interruption. The proposal implies that if a person is applying for a position involving dangerous goods, he/she must have been trained prior to applying for the position. A person entering the job market may not be aware of the training requirements and he/she would expect the Company to provide the appropriate training to address the function for which they were hired. Further a company may find it necessary to assign another employee or to obtain the services of a temporary person to fill an unexpected vacancy until a full time person can be hired. Temporary employment agencies do not train their placement employees in regulatory matters and they would expect the employer to provide the appropriate training to ensure compliance. COSTHA agrees with the Expert from Sweden that it is not sufficient for the company to promise that the person shall receive training sometime in the future. A reasonable time should be specified within the Model Regulations after which the employee must have been trained.

COSTHA believes that 1.3.4 currently addresses the training provision or verification including some reference to unspecified time requirement and that a proposal to add a specific time period should be included in the proposed wording.

### **Suggested revised proposal**

5. Amend the present text of 1.3.1, 1.3.2, and 1.5.2.7 as follows:

“1.3.1 Persons engaged in the transport of dangerous goods **shall receive (see 1.3.4)** training on the provisions of dangerous goods regulations commensurate with their responsibilities. Training requirements specific to security of dangerous goods in Chapter 1.4 shall also be addressed.”

“1.3.2 Individuals who classify dangerous goods; pack dangerous goods; mark and label dangerous goods; prepare transport documents for dangerous goods; offer or accept dangerous goods for transport; carry or handle dangerous goods in transport; mark or placard or load or unload packages of dangerous goods into or from transport vehicles, bulk packagings or freight containers; or are otherwise directly involved in the transport of dangerous goods as determined by the competent authority; **shall receive (see 1.3.4)** the following training:

(a) *General awareness/familiarization training:*

(i) Each person **shall receive (see 1.3.4)** training designed to provide familiarity with the general provisions dangerous goods transport requirements:

(ii) (no changes)

(b) *Function-specific training:* Each person **shall receive (see 1.3.4)** detailed training concerning specific dangerous goods transport requirements which are applicable to the function that person performs;

(c) *Safety training:* Commensurate with the risk of exposure in the event of a release and the function performed, each person **shall receive (see 1.3.4)** training on:

1.3.4 The training required by 1.3.2 shall be provided **within XX days of employment** or verified upon employment in a position involving dangerous goods transport and shall be periodically supplemented with retraining as deemed appropriate by the competent authority.

1.5.2.7 Workers **shall receive (see 1.3.4)** appropriate training concerning the radiation hazards involved and the precautions to be observed in order to ensure restriction of their exposure and that of other persons who might be affected by their actions”.

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