

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

Geneva, 15-19 September 2008

Item 5 (b) of the provisional agenda

**PROPOSAL TO REMOVE REFERENCE TO SPECIFIC SUBSTANCE TYPES
FROM THE SAFETY ADVISER EXAMINATION (SUB-SECTION 1.8.3.13)**

Comments of Belgium to document ECE/TRANS/WP.15/AC.1/2008/17
of the United Kingdom

1. In document ECE/TRANS/WP.15/AC.1/2008/17, the United Kingdom proposes to remove or restrict the option of examining dangerous goods safety advisers on specific classes or substances. In the proposal it is explained why, in its view, it would be more appropriate for all dangerous goods safety advisers to be qualified in all classes of dangerous goods.

But it should not be forgotten that for all Member states/Contracting parties that share this view, the existing sub-section 1.8.3.13 is not creating any problems : the class specific examinations for the safety adviser are a mere option and need not be introduced if they are considered inappropriate.

On the other hand, the United Kingdom does not provide any safety – or other – argument why Member states/Contracting parties, that are of the opinion that class specific examinations result in a higher degree of competence, should be forced to change an examination system they are very satisfied with.

2. It is, of course, true that safety adviser examinations are designed to demonstrate competence in the ability to understand the structure of the regulations in order to be able to identify all pertinent requirements of a transport operation and to advise an undertaking on their application. But it is also true that for class 1 – and even more so for class 7 – this structure and the requirements differ fundamentally from those for the other classes (in many countries, even the competent authorities are different !).

Moreover, in most countries only a very limited number of specialized and approved undertakings is involved in the transport of explosives and radioactive material. The vast majority of candidates will therefore never be faced with the complex procedures it entails and will never need the corresponding training certificate.

For the ones that will be active in these specialized fields, a “general” safety adviser examination (for all classes) will not reveal their ability to advise an undertaking on the application of these diverging requirements : wrong answers to the few questions relating to these two classes will not prevent them from passing the examination.

Belgium therefore is of the opinion that it is most appropriate to single out class 1 and class 7 for a restricted qualification.

3. The class specific examination for fuels and heating oils has been introduced to take account of the specific needs of the (in many cases small) companies active in the distribution of these products. Without it, the number of external safety advisers will increase drastically and experience has shown that, in this sector, these external safety advisers tend to be active in a lot of companies, spending only a very limited amount of time and effort to each company individually.
4. Option 2 of the UK proposal is to delete indents two and five of 1.8.3.13 ; the indents being :
 - Class 1 ;
 - Class 2 ;
 - Class 7 ;
 - Classes 3, 4.1, 4.2, 4.3, 5.1, 5.2, 6.1, 6.2, 8 and 9 ;
 - UN Nos. 1202, 1203 and 1223 [*to be completed as decided by WP.15*].

Belgium does not agree with this proposal, but notes that if the specific examination for class 2 is eliminated, this class is to be added to those listed in indent four.
