Proposal to remove reference to specific substance types from the safety adviser examination (sub-section 1.8.3.13)

Transmitted by the European Industrial Gases Association

Background

The expert from the United Kingdom has transmitted document ECE/TRANS/WP.15/AC.1/2008/17. Within this document a number of options are proposed which would remove the safety adviser examination options for a number of selected classes, in particular Option 2 and 3 which would impact Class 2. Within 1.8.3.13, the possibility that: “The contracting parties may decide that candidates who intend working for undertakings specializing in the carriage of certain types of dangerous goods need only be questioned on the substances relating to their activities” has been an option for a number of years and many distributors of Class 2 products for EIGA member companies across the applicable geographical area have taken advantage of this. The majority of Class 2 distributors only handle Class 2 products and by adding the burden of the additional Classes will do little if anything to improve safety.

Proposal

The recommendation of EIGA is to leave the text as it is and allow Dangerous Goods Safety Advisors for Class 2 products to be able to continue with their specialism for this Class.

Justification

The existing scheme has worked well, and EIGA is not aware of any safety issues being raised about this text. As an example, statistics advised to EIGA indicate that approximately 11% of all dangerous goods transported are from Class 2, and as such it is not inappropriate to have dedicated Safety Advisors for this Class of product. Information from member companies across Europe indicates that there are in fact many who only take the exam applicable to Class 2.

Enforceability

No problems foreseen as the existing regime continues.