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 Kingdom

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)
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.