
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

111th session

Geneva, 9 - 13 May 2022

10 May 2022

Item 6 of the provisional agenda

Interpretation of ADR

Security features - certificates of approval for vehicles according to 9.1.3 ADR

Transmitted by the Government of Austria

1. Recently a formal problem was noticed due to a roadside check regarding the certificate of approval for vehicles according to 9.1.3 ADR of another contracting party, because 9.1.3.3 ADR states that “*the certificate of approval shall have the same layout as the model shown in 9.1.3.5.*”.
2. However, the certificate had security features to protect against forgery and the use of security features is not mentioned in the ADR for these certificates. With security features, the certificate did not look like the model.
3. Current 9.1.3.3 ADR: “*The certificate of approval shall have the same layout as the model shown in 9.1.3.5. Its dimensions shall be 210 mm × 297 mm (format A4). Both front and back may be used. The colour shall be white, with a pink diagonal stripe.*”
4. We would like to start a discussion on how to deal with these certificates which do not look like the models laid down in 9.1.3 ADR.
5. With support of this meeting there could be a clarification on interpretation.
6. Also there could be an amendment to bring a real legal basis into ADR, containing an additional note or even a modification of 9.1.3 ADR; for example an additional sentence could be added in 9.1.3.3 ADR to allow security features.
7. A similar but complex legal basis can be found in 8.2.2.8 ADR for the Certificates of driver's training (8.2.2.8.3 and 8.2.2.8.6 ADR):
8. Current 8.2.2.8.3 ADR: “*...The colour shall be white with black lettering. It shall include an additional security feature such as a hologram, UV printing or guilloche patterns.*”

Justification:

9. Any action could help the authorities at carrying out the required roadside checks.
 10. This topic only affects the ADR and not the RID, also there is no collision with the EU regulatory.
-