

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

111th session

Geneva, 9 - 13 May 2022

Item 6 of the provisional agenda

Interpretation of ADR

11 May 2022

Comments on document INF.24

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

Transmitted by the Government of Poland

- 1 Document INF.24 presented by Austria concerns the "*Certificate of approval for vehicles carrying certain dangerous goods*", which was issued by the competent authority in Poland.
- 2 Clarifying Austria's doubts as set out in the informal document INF. 24 we would like to emphasize that the competent authority in Poland had to introduce additional security features for this document, because in Poland, category 2 public documents must have such security features. This is due to our national regulations issued by the Ministry of the Interior.
- 3 In Poland, *the certificate of approval for vehicles carrying certain dangerous goods* specified in 9.1.3.5, in accordance with the regulations issued by the Ministry of the Interior, has been included in category 2 documents, which require additional security.
- 4 In addition, experts from the Polish Security Printing Works issued an opinion that "the background is white" and only a guilloche pattern was applied to this document.
- 5 Therefore, based on the opinion of experts from the Polish Security Printing Works in Poland, we are of the opinion that the document is correctly issued and does not require any corrections.
- 6 Please note that ADR regulations do not prohibit and do not require additional security features to be applied to this document.
- 7 Of course, we are not opposed to introducing modifications to the provisions on the "*Certificate of approval for vehicles carrying certain dangerous goods*" with regard to additional security features of this document..
- 8 Poland would not like to introduce the mandatory security of the "*Certificate of approval for vehicles carrying certain dangerous goods*" or prohibit the use of additional security features of this document and believes that in future ADR issues, the provision in 9.1.3.3 ADR should be modified.
- 9 In 9.1.3.3 at the end of the first intend we suggest adding the following sentence:
"The certificate may include an additional security feature such as a hologram, UV printing or guilloche patterns."
- 10 As everyone knows, this topic applies only to vehicles covered by ADR regulations and with the consent of the majority of WP15 participants, such a modification could already be introduced into the issue of ADR 2023.
- 11 Alternatively, it is possible to additionally oblige the States which introduce additional security features in the "*Certificate of approval for vehicles carrying certain dangerous goods*" to inform other Member States of ADR about this on the websites of UN ECE.

Proposal

12. In 9.1.3.3 ADR at the end of the first intend we propose adding the following sentence:

"The certificate may include an additional security feature such as a hologram, UV printing or guilloche patterns."

Justification

1. This topic is only for ADR, not RID, also there is no conflict with EU regulations.
 2. The modification of the provision in 9.1.3.3 does not involve any costs. The aim is to present an unambiguous position on the additional protection against forgery of the *Certificate of approval for vehicles carrying certain dangerous goods*, the specimen of which is given in 9.1.3.5 ADR.
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