Interpretation issue on training provisions in Chapter 1.3

Transmitted by the Government of France

Introduction

1. The government of France has been made aware of an issue related to training provisions in Chapter 1.3.

2. In accordance with 1.3.1, all persons employed by the participants referred to in Chapter 1.4 whose duties concern the carriage of dangerous goods, shall be trained in the requirements governing the carriage of such goods appropriate to their responsibilities and duties.

3. Referring to Chapter 1.4, consignees, as one of the participants should be trained in conformity with the provisions of Chapter 1.3.

4. Some dangerous goods are subject to unloading operations at private homes (e.g. LPG, heating oil…) or in small businesses (hairdressing salons, bakeries, etc.).

Questions

5. France would like to submit the following interpretation questions for consideration by the Joint Meeting:

   **Question 1**: Are persons at private home or persons employed by small businesses considered as consignees according to Chapter 1.4 provisions?

   **Question 2**: If the answer at the first question is yes, do they have to fulfill provisions from Chapter 1.3?

6. As this is certainly not possible for such households and small entities, if the answers to the questions above are positive, is it necessary to amend the regulations?