

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Item 5 (b) of the provisional agenda

**Proposals for amendments to annexes A and B of ADR:
miscellaneous proposals**

Training obligation of the driver (vehicle crew) transporting dangerous goods packed in limited quantities

**Transmitted by the International Association of Dangerous Goods
Safety Advisers (IASA)**

Summary

Executive summary: Chapter 3.4.1 lists all the requirements of ADR/RID which remain valid for carriage in accordance with Chapter 3.4. IASA is of the opinion that section 8.2.3 should also be included in the list in accordance with 3.4.1

Action to be taken: Amend ADR 3.4.1 (h) (changes in bold): **8.2.3**, 8.6.3.3 and 8.6.4

Introduction

Section 3.4.1 indicates that the chapters of 1.3 on training apply to the carriage of LQ goods. In Chapter 1.3, Note 2 makes reference to Regulation 8.2, which describes the requirements for the training of the vehicle crew, incl. training of persons other than certified drivers in accordance with 8.2.1, involved in the carriage of dangerous goods by road (8.2.3 ADR). Provision 3.4.1 (h) of Part 8 („Part 8” missing) does not mention provision 8.2.3, which is inconsistent with the requirements of Section 1.3 and raises doubts as to whether drivers carrying dangerous goods packed in limited quantities are subject to training in accordance with section 1.3. The addition of rule 8.2.3 in 3.4.1 (h) expressly indicates the obligation to train not only employees dealing with loading, unloading, packing (and other activities), but also drivers transporting dangerous goods packed in limited quantities.

3.4.1 reads as follows:

“3.4.1 This Chapter provides the provisions applicable to the carriage of dangerous goods of certain classes packed in limited quantities. The applicable quantity limit for the inner packaging or article is specified for each substance in Column (7a) of Table A of Chapter 3.2. In addition, the quantity "0" has been indicated in this column for each entry not permitted to be carried in accordance with this Chapter. Limited quantities of dangerous goods packed in such limited quantities, meeting the provisions of this Chapter are not subject to any other provisions of ADR except the relevant provisions of:

(a) Part 1, Chapters 1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.8, 1.9;

(b) Part 2;

(c) Part 3, Chapters 3.1, 3.2, 3.3 (except special provisions 61, 178, 181, 220, 274, 625, 633 and 650 (e));

(d) Part 4, paragraphs 4.1.1.1, 4.1.1.2, 4.1.1.4 to 4.1.1.8;

- (e) Part 5, 5.1.2.1(a) (i) and (b), 5.1.2.2, 5.1.2.3, 5.2.1.10, 5.4.2;
- (f) Part 6, construction requirements of 6.1.4 and paragraphs 6.2.5.1 and 6.2.6.1 to 6.2.6.3;
- (g) Part 7, Chapter 7.1 and 7.2.1, 7.2.2, 7.5.1 (except 7.5.1.4), 7.5.2.4, 7.5.7, 7.5.8 and 7.5.9;
- (h) 8.6.3.3 and 8.6.4.”

Proposal

Amend ADR 3.4.1 (h) (changes in bold)

“(h) **8.2.3**, 8.6.3.3 and 8.6.4”

Justification

The addition of rule 8.2.3 in 3.4.1 (h) expressly indicates the obligation to train not only employees involved in loading, unloading, packing (and other activities related to the transport of dangerous goods), but also drivers transporting dangerous goods packed in limited quantities.

Drivers or persons other than the drivers holding a certificate in accordance with 8.2.1, involved in the carriage of dangerous goods by road usually transport dangerous goods under exemptions from ADR (in accordance with 3.4 or 1.1.3.6) and should be subject to mandatory training (general awareness, Function-specific and Safety). Adding a point „8.2.3” in 3.4.1 (h) there will be no doubt that the driver (vehicle crew) transporting dangerous goods packed in limited quantities require training in accordance with 1.3.
