

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

113th session

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Geneva, 15-17 May 2023

Item 5 (b) of the provisional agenda

Proposals for amendments to annexes A and B of ADR

Miscellaneous proposals

Training of drivers: maximum number of teaching units per day

Transmitted by the Swiss government

1. Switzerland would like to hear the Working Party's opinion on the maximum number of teaching units per day prescribed for the training of drivers. The intention is to define what the ADR means by "normally" and whether delegations would accept increasing the maximum number of teaching units per day to allow for more flexibility in organising the training.

Current provisions

2. Section 8.2.2 ADR regulates the contents and the form of the training of drivers. In particular, it prescribes a minimum number of teaching units for the initial training programme (8.2.2.4.1) and for the refresher training programme (8.2.2.5.2).

3. The ADR also states that teaching units are intended to last 45 minutes (8.2.2.3.6) and limits the number of units that can be conducted in a day. 8.2.2.3.7 states: "Normally, not more than eight teaching units are permitted on each training day".

4. These eight units equal 6 hours of teaching.

Discussion

5. In Switzerland, the training of drivers is organised in the form of individual and comprehensive courses. The courses are mainly attended by people who are also undertaking full training for professional drivers (for example, an initial qualification as defined in Directive (EU) 2022/2561¹). These people are therefore used to attending courses with a duration of more than 6 hours a day.

6. In some cases, the maximum number of eight teaching units prevents the optimal organisation of the training. In our opinion, those people on training would be able to attend ten teaching units per day (7.5 hours).

7. Finally, we would like to draw the Working Party's attention on the provisions of Directive (EU) 2022/2561 which requires compulsory periodic training to be given in periods of at least 7 hours (Annex I, Section 4), and that these 7 hours may be carried out in one day.

Questions to the Working Party

8. What does "normally" in 8.2.2.3.7 mean?

¹ Directive (EU) 2022/2561 of the European Parliament and of the Council of 14 December 2022 on the initial qualification and periodic training of drivers of certain road vehicles for the carriage of goods or passenger.

9. Have any country ever allowed days with more than eight teaching units and if so, in which case?
10. What is the Working Party's view on removing the ambiguity of the term "normally" and amending 8.2.2.3.7 as follows: "**Not more than ten teaching units are permitted on each training day**"?

Justification and next steps

11. This amendment would allow for greater flexibility in the organisation of courses while leaving a safeguard, since in any cases, training courses shall be subject to approval by the competent authority (8.2.2.6.1).
 12. Depending on the outcome of the discussions, Switzerland will submit a formal proposal for the November 2023 meeting.
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