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## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

##### 114th session

Geneva, 6-10 November 2023

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 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. IASA submitted informal document INF.12 at the 113<sup>th</sup> session of the Working Party (May 2023), which was supported by several delegations.

**Action to be taken:** Amend ADR 3.4.1 (h)

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\* A/77/6 (Sect. 20), table 20.6



## Introduction

1. Section 3.4.1 indicates that Chapter 1.3 on training of persons involved in the carriage of dangerous goods applies to the carriage of goods in limited quantities. In Chapter 1.3, Note 2 refers to Chapter 8.2, which describes the requirements for the training of the vehicle crew, including 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). Sub-paragraph 3.4.1 (h), with the provisions from Part 8 which remain applicable, does not mention 8.2.3, which is inconsistent with the requirements of Chapter 1.3. This raises doubts as to whether drivers carrying dangerous goods packed in limited quantities are subject to training in accordance with Chapter 1.3. The addition of 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.

## Proposal

2. Amend ADR 3.4.1 (h) as follows (changes in bold):

“(h) **8.2.3**, 8.6.3.3 and 8.6.4.”

## Justification

3. The addition of 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.

4. 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 “8.2.3” in 3.4.1 (h) there will be no doubt that the drivers (vehicle crew) transporting dangerous goods packed in limited quantities require training in accordance with 1.3.

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