



Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Dangerous Goods****116th session**

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Item 4 (b) of the provisional agenda

**Proposals for amendments to annexes A and B of ADR:
miscellaneous proposals****Documents to be carried on the transport unit****Transmitted by the Government of the United Kingdom of Great
Britain and Northern Ireland*****I. Background**

1. The documents to be carried on the transport unit are specified in 8.1.2 and fall into two parts: 8.1.2.1 lists three documents that shall be on the transport unit (and in the driver's cab from ADR 2025), and 8.1.2.2 lists a further three documents when required by ADR.
2. 8.1.2.1 (d) is the requirement to have photographic identification. Listed as a separate document in 8.1.2.2 (b) is the driver training certificate. Both documents include a photograph. This raises a compliance question given that ADR currently views photographic identification and the driver training certificate as two separate documents; is it permissible to allow the driver training certificate to "stand in" as the photographic identification?
3. There are some instances where a driver training certificate is not required but photographic identification is. For example, the section on exemptions related to quantities carried (1.1.3.6) provides an exemption from part 8 (except for 8.1.2.1 (a) the transport document), meaning no other documents are required.
4. However, "means of identification" is referenced in 1.10.1.4. As will be known, 1.1.3.6.2 exempts the requirements of 1.10 except in cases where high consequence dangerous goods are carried (listed in 1.10.3.1). Where high consequence dangerous goods are carried, then the requirements of 1.10 will need to be met, including 1.10.1.4. In instances where these high consequence dangerous goods have a transport category other than 0, it will mean photographic identification will be needed but not a driver training certificate if carrying packages below the applicable limited load threshold.
5. Considering this, it would not be appropriate to combine the two documents in 8.1.2. Most would, however, accept the practicality of allowing the driver training certificate to

* A/78/6 (Sect. 20), table 20.5.



“stand in” as the photographic identification. Therefore, to formalise this position the following proposal is made.

II. Proposal

6. Add the following note under 8.1.2.1 (d):

“NOTE: Where a driver or a crew member is carrying their driver training certificate, a separate photographic identification document is not required.”
