

TRANSPORT OF DANGEROUS GOODS TECHNICAL COMMITTEE and WORKSHOP

on RID and the role of the competent authority in relation to the safety obligations of the participants

10-12 December 2024

CONCLUSIONS

- A new version of RID and ADR will enter into force on 1 January 2025.
- In order to address the needs of the Observing Participants and Regional Partners to understand more in depth the rules applicable for the international carriage of dangerous goods by rail – RID, the meeting included in the Agenda the representatives of the OTIF Secretariat and ERA, Latvia and France who kindly agreed to share their experience in implementation of these regulations.
- While OTIF presented the 2025 amendments, highlighting the ADR or RID specific ones, the representatives of ERA highlighted the correspondence between general railway safety law and RID, in particular in relation to the safety management systems and the authorisation of vehicles.
- The steps to be taken view to ensuring an increase of the safety culture of the participants in carriage and DGSA training were at the core at this session.
- Knowledge about the latest testing procedures and technical evolutions in areas such as batteries and batteries storage systems were shared by the representative of the French Institute for Industrial Environment and Risks (Ineris).

Day 1 - RID& railway safety legislation	
1.	Adoption of the Agenda
	The Agenda was adopted with an editorial amendment.
2.	Opening Remarks

A warm welcome was addressed by Transport Community's Permanent Secretariat Deputy Director, Ms. Ljupka Siljanoska who thanked the Latvian authorities, ERA, OTIF and France for the support in organising this meeting.

The initiative for further in-depth analysis of RID and its connections with safety legislation answers the requests of Georgia for further assistance in this field.

She congratulated the Regional Partners and Observing Participants for the progress achieved this year and encouraged them to continue cooperation with the TCT Secretariat, EU and its Member States on these areas.

3. Overview of actors in EU Railway safety

This point developed the role of ERA according to Regulation (EU) 2016/796 and its support for the development of the Single European Railway Area guaranteeing a high level of safety. The measures envisaged to that end have an impact on railway transport of dangerous goods.

The basic principles and approach to safety certificates of railway undertakings (RU) and the safety authorisations of the infrastructure managers (IM) and associated safety management systems, under the supervision of the national safety authorities were presented.

It was reminded that ERA had, from June 2016, new authority tasks in relation with safety certification of the railway undertaking, authorisation for placing of railway vehicles on the EU market and infrastructure track side approvals. Concerning railway vehicles, this implies that both the RID tank specifications as well as the Technical Specifications for Interoperability applicable to tank-wagons need to be complied with.

The table containing the roles and obligations of the 15 EU most relevant legislative texts interfacing with RID was brought into discussion, in particular in connection with the safety management systems, vehicle authorisation and maintenance of vehicles.

ERA's legal basis for involvement in transport of dangerous goods was presented (Art. 17 of Regulation (EU) 2016/796), together with the latest activities of the Agency in the field.

4. Railway operators SMS. Role of the Dangerous goods safety advisor and activities

The obligations of railway undertakings (RU) and infrastructure managers (IM) to implement the necessary risk control measures were reviewed, in particular with regard to legal obligations to maintain and improve safety levels based on Directive (EU) 2016/798.

Ms Ellen Rogghé (ERA) further highlighted the parallelism between the objectives comprised in the Directive (EU) 2016/798 and RID section 1.8.3.3. The DGSAs need to contribute to the development of safety and legal compliance which needs to address all relevant factors, the link with the safety management system is crucial here and was explained. Compliance with RID requirements was highlighted as a common obligation for consignor, carrier, consignee, loader, packer, filler, container/wagon operator, infrastructure manager, unloader, entity in charge of maintenance. Correspondence between safety obligations and chain responsibility of railway undertakings and carrier, infrastructure manager and safety adviser was elaborated.

5. Authorisation, registration and maintenance of wagons

A brief presentation of the authorisation of wagons according to the 4th Railway Package was performed by Mr. Nikola Ilievski (ERA) and Mr Sorin Hanci (ERA). It was mentioned that more in depth discussions are needed on this point, and that TDG experts should also cooperate on this aspect with the members of the Railway Committee.

The concept of area of use was introduced, mentioning also that the type of authorisation depends on the area of use as well as the authorising entity.

The authorisation process was presented, in particular the EU harmonised process with a focus on the different stages.

Directive (EU) 2016/797 and the Commission Implementing Regulation (EU) 2018/545 were briefly presented, in particular regarding the obligations of the applicant who is applying for authorisation for placing on the market.

In this context, the requirements concerning the tank certificate and tank record in sections 1.8.7.2.2.3 and 1.8.7.5 of RID need to be obtained prior to authorisation. The file presented for authorisation contains the type certificate and the first inspection certificate, as well as the inspection certificate for "entry into service".

The European Register of Authorised Types of Vehicles (ERATV), the European Railway Agency Database of Interoperability and Safety (ERADIS) were briefly presented. The European Vehicle Register (EVR) and the European Centralised Virtual Vehicle Register (ECVVR) were also presented with their specificities of scope and addresses.

Maintenance of railway vehicles was also in focus, in the context of Safety Directive 2016/798 and Regulation (EU) 2019/779. The ECM certification process was also highlighted, with regards to the 3rd party certification in accordance with ISO 17011 and Regulation 765/2008/EC¹, as amended, and the different types of ECM Certification Bodies were also explained.

The competent authorities were advised to go through the ERA published soft instruments, particularly the Guides concerning the certification of entities in charge of maintenance.

Follow up was commonly agreed by all participants in the workshop because the vehicle authorisation will need further insight. TDG delegations were asked to keep constantly in touch with colleagues dealing with general railway safety issues and to follow up closely the evolution of implementation of the 4th railway package in their domestic legislation. ERA remains at disposal for assistance, but first and foremost development of institutions at national level is necessary.

Day 2 - RID 2025 and international context. Battery regulations

6. The representative of the Intergovernmental Organisation for International Carriage by Rail (OTIF), Jochen Conrad, presented the structure of the COTIF convention and the correspondence of RID with the other appendixes of COTIF. The evolution of the international conventions and regulations since the end of the XIXth century and the harmonisation work performed to ensure inter-modal coherence in the XXth century

¹ 7http://data.europa.eu/eli/reg/2008/765/2021-07-16

were also presented, together with the process of amendment every 2nd year. It was highlighted that all EU Member States that have a railway network are contracting parties to RID and decided to apply RID for their national transport. The decision making process for the international agreements – ADR, RID and ADN was highlighted once again, underling the fact that the upstream rules are also extremely important in order to understand the functioning of the system. The biennial system of amendment is meant to allow all contracting parties to express their needs and adjust the rules in the international agreements accordingly. Contracting parties were invited to participate in the process more actively and were also reminded that the next version of RID enters into force on 1 January 2025.

Translation of the international agreements in domestic languages is essential to develop know how in administration and industry alike.

7. The representative of Georgia presented the current level of adaptation of this Observing Participant to EU law and the way the policy is expected to be developed in the future. The Railway Transport Reform in Georgia envisages the implementation of 8 legal acts (directive/regulations) of the European Union, with which this Observing Participant has an obligation of legal approximation. The role of the national safety authority will be essential in issuance, renewal, suspension and revocation of safety certificates for railway undertakings. In the first phase of the policy reform, legislation on dangerous goods will need to be transposed and implemented. The "Rules for transport of dangerous goods by rail" are expected to be adopted by the Government of Georgia by the end of the year. The adaptation to RID is a staged process as on a considerable part of the infrastructure SMGS Annex II - the appendix to the Agreement of the Organisation for the Cooperation of Railways concerning International Carriage of Goods by Rail (SMGS) of 1 November 1951 needs to continue to apply. Oil and petroleum products and fertilisers are the most frequently transported dangerous goods on Georgian railways and safety and security measures are important to be respected in order to ensure commercial exchanges with such goods. Taking into consideration that the Georgian administration already envisages a staged approach to RID implementation, the Georgian delegation in the Committee expressed a wish to receive technical assistance from TC, the EU Member States and the Commission services to that end. TC welcomed the progress in Georgia towards RID, and advised further follow-up and attention to technical terminology.

Albania also presented the legislation put in place for implementation of RID, highlighting that, at the current stage, the biggest achievement is cooperation at expert level under the auspices of the Inter-Ministerial Committee for the Transport of Dangerous Goods. However, activities at expert level need further support and political attention, in particular with regard to financing the publication of ADR and RID 2023 and – most importantly – the translation of the 2025 version into Albanian. The Railway Safety Authority has been recently established, but still needs personnel and knowledge to make sure that railway undertakings comply with the conditions for their safety authorisations and certificates. The most important part of the Albanian transport of dangerous goods is that of petroleum products – to and from the Fiery refinery. Entities in charge of maintenance are currently being established and separated from Albrail.

There is a need of enhanced exchanges of experience once translations will be made available.

TC confirmed that further projects could be envisaged provided that there is proof of progress in terms of accessibility of the international agreements to the relevant stakeholders involved in application of RID and/or ADR. One TAIEX project was stopped due to absence of progress in terms of translations. Albania asked the study visit be performed in the project related to TAIEX 84532 on "Adaptation of applicable procedures for the implementation of the IMDG Code (International Maritime Dangerous Goods) within the framework of the implementation of Directive 2008/68/EC". They informed that some developments were achieved with the Regulation on the National Maritime Single Window in terms of reporting obligations of dangerous goods on board of ships.

The Commission also intervened in the meeting in order to inform the participants about the latest legislative evolutions and the adoption by the Commission of the draft Delegated Directive COM(2024)7874 that is currently under consultation with the Council and the European Parliament. It is expected to be published in January 2025.

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The Commission highlighted that RID needs to be complied for international and domestic transport alike, to comply with the requirements in Directive 2008/68/EC. The transitional provision in Annex II, Section II.1 of Directive 2008/68/EC provides for the possibility to maintain and adopt provisions for its territory on the transport of dangerous goods by rail from and to contracting parties to OSJD. By the means of appropriate measures and obligations the Member States concerned shall guarantee the maintenance of a level of safety equivalent to that provided for in Annex II, Section II.1, i.e. RID.

As an indication for further developments, it was mentioned that the best transposition is to make a direct reference to RID and avoid copying RID provisions.

TC explained that the inclusion of definitions from the international agreements in primary legislation that needs to go through parliamentary procedures risks to create conflicts with international obligations when RID is amended.

Tables of concordance need to illustrate the correspondence between the domestic laws and a Directive. Moreover, mix of pieces of legislation present a risk related to incapacity to develop appropriate institutions to deal with the administrative tasks attributed to different authorities.

The representative of the Latvian national safety authority presented the necessary adaptation his country undertook to become a Member State. It was highlighted the fact that TDG was included in an effort to adapt to the different evolutions in general railway safety, in particular the 4th railway package of 2016. The Latvian representative also came to the point related to the application of SMGS Annex 2 and the fact that compliance with these rules is allowed in transport to and for 3rd to the EU Countries.

The Law on the Movement of Dangerous Goods in Latvia was briefly introduced. It was highlighted that the competences of the different governmental bodies need to be clearly highlighted in national measures and that all the relevant competent authorities need to invest into complying with their assumed obligations under international law. The State Railway Technical Inspectorate, the Latvian NSA, is competent to perform supervision of performance of safety and security measures in carriage of dangerous goods by rail. It administrates the DGSA certification,

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supervises the works of DGSAs in enterprises, audits enterprises which deal with carriage of dangerous goods (loaders, fillers, consignors). The list of other competent authorities in Latvia comprises the Ministry of Economics and Latvian National Accreditation Bureau, the Ministry of Interior, the Ministry of Environmental Protection and Regional Development. The most important task is the qualification of personnel, in particular the dangerous goods safety adviser (DGSA) training and qualification.

From this point of view, national legislation in SMGS countries can present significant differences. With the extension of the EU to east, RID and rail legislation have undergone a very thorough process of elimination of technical rules which makes both easy instruments to apply.

It was highlighted that the correct implementation and use of SMGS Annex 2 is the first step in implementation of RID.

The real challenges concerning adoption of RID are related to the procedures concerning conformity assessment and inspections, transport documents etc. The roles and responsibilities of all actors differ significantly, therefore the 3rd party conformity assessment and inspections need to be performed according to the relevant standards in RID. The information in the transport document needs to be clearly written and the emergency cards system needs to be used. A special attention should be paid to mixed loading provisions. The tank wagons constructed for gauge 1520 mm need to be maintained to the required safety levels, similar to RID.

It was agreed that the subjects above be envisaged for further follow up in the future activity of the Committee.

The representative of the OTIF Secretariat, Jochen Conrad, presented a thorough synopsis of the amendments to RID and ADR. In his presentation, the common provisions for the modes were written in black, the RID specific provisions in red, while blue text referred to ADR only. This presentation can be a useful guide for translators, as it highlights where exactly the mode specific provisions are. The TCT Secretariat thanked OTIF for the systematisation effort which is beneficial to all users of the international agreements. The most important provisions added were highlighted only, due to lack of time. It was also indicated that the reasoning behind most of the amendments can be found on the OTIF websites in articles of the Bulletin

of International Carriage by Rail (see https://otif.org/en/?page_id=220). Where Regional Partners or Observing Participants are contracting parties to the agreements, they were invited to be more active in international negotiations.

Some new UN numbers included in the classification are UN 0514 FIRE SUPPRESSION DISPERSING DEVICES, UN 3551 SODIUM ION BATTERIES with organic electrolyte, UN 3552 SODIUM ION BATTERIES CONTAINED IN EQUIPMENT or SODIUM ION BATTERIES PACKED WITH EQUIPMENT, with organic electrolyte, UN 3553 DISILANE, UN 3554 GALLIUM CONTAINED IN MANUFACTURES ARTICLES, UN 3556 VEHICLE, LITHIUM ION BATTERY POWERED etc.

Notifications with the amendments to RID and ADR were sent to all contracting parties in June 2024. The amendments are available on the UN and OTIF websites and the links were also compiled in page 24 of the 3rd Progress report on the Guidelines².

The Head of the TDG Mission of the French Ministry of Ecological Transition, Karoly Vizy presented the Legal Regime for Lithium battery transport in UN Model Regulations, RID and ADR.

He explained that in order to allow for circulation of dangerous goods worldwide, the UN Model Regulations contain the most important rules concerning to manufacturing and packaging of lithium batteries. They are then adapted for specific transport modes, with some specific aspects being developed in RID and ADR. However, for all dangerous goods, included defective and waste batteries, there are rules for packing to be able to transport them safely for repair or as wastes. The competent authorities need to be aware about the existence of the UN numbers for lithium batteries and the differences between them (UN 3090, 3091, 3480, 3481, 3551, 3552) and about the use of batteries in articles or vehicles (see UN 3536, 3556, 3557, 3558). The list in Chapter 3.2 leads to the special provisions in column (6) of Chapter 3.3, that need to be consulted in conjunction with the packing instructions in column (8) and section 4.1.4.

In his intervention, the French delegate illustrated the differences in classification according to ADR and RID which are specific for Europe and are highly influenced by

² 2024-Report-on-the-Guidelines-on-Transport-of-dangerous-goods.pdf

the EU legislation on chemicals, explosives etc. The specificities for land transport are reflected in the hazard classification numbers, provisions for labels to be affixed on packaging and transport Units. The current work in relation with lithium batteries concerns the thermal runaway test and the induced effects (e.g. propagation to the battery/to nearby batteries etc.).

France is an active member in the working group of the UN Subcommittee of Experts for batteries and highlighted some of the points where discussions are ongoing – propagation of thermal runaway to adjacent cells or batteries, emission of heat, emission of toxic/explosive gas etc.

Whenever there are issues related to batteries - e.g. classification or packaging of batteries - there is expertise within the EU Member States that can be put at disposal if the appropriate channels are used. Moreover, whenever projects such as the one of the Energy Community are put in place the information provided by the producer of the battery storage system should be used to the largest extent possible, included in terms of treatment of such storage systems as wastes.

12. A representative of the French Institute for industrial environment and risks (INERIS), Arnaud Bordes came with a very practical presentation of the types of batteries/means of energy storage present on the global market, their composition and correspondence with the UN number (classification). The types of batteries currently in use in electric vehicles were briefly presented as well as the types in use for small personal gadgets, such as computers, drilling machines or headphones etc. The stationary storage systems (UN 3536) were also presented. Videos of incidents in which such batteries were involved were presented to the audience, highlighting the fact that preparedness and knowledge about potential dangers is essential. Moreover, the data resulting from such incidents need to be put at disposal to the international community for regulatory and prevention purposes. The thermal runaway phenomenon was presented in the case of lithium ion batteries and the test series UN 38.3 needs to be complied with during the manufacturing process of the battery. The test criteria include the altitude stimulation, the thermal test, the overheat and thermal runaway, vibration and shock test, external short circuit test etc.

The test in the UN Manual of Tests and Criteria were also illustrated with video footage.

The limits of the current regulation were presented, and the challenges in development of latest technologies. A more in depth classification is to be expected in the future, in particular in terms of key hazard (e.g. propagation, fire, flammable gas etc.) and this could also consider a certain state of charge in transport.

However, it needs to be kept in mind that the UN Model Regulations amendments always take at least 4 years before being included in the modal regulations for Europe.

INERIS can exemplify further and explain the testing procedures for batteries should Regional Partners be interested in more in-depth exchange of experience. However, appropriate funding mechanisms should be found to that end.

Day 3 - DGSA, market surveillance, national safety authority (NSA) obligations, TC specific activities

The representative of the Latvian State Railway Technical Inspectorate explained the convergence between the dangerous goods safety advisor function in section 1.8.3 and the obligations of the participants in TDG listed in Chapter 1.4. Carriers, consignors, packers, loaders, fillers, unloaders need to have a DGSA to follow-up the compliance of the internal procedures in each economic actor with the regulations. Based on the Law on transport of dangerous goods, the Regulations of Cabinet of Ministers for Safety Advisers Regarding Carriage of Dangerous Goods by Road and by Rail contain the requirements for obtaining a certificate of training of a safety adviser. These regulations refer to the examination requirements, as well as the requirements in relation to the training courses and their supervision. An Examination Commission which includes representatives of the Ministry of Transport, the Road Transport Administration, and the State Railway Technical Inspectorate was established to coordinate and control the system.

The training course content for DGSAs is developed by the training institutions and the Examination Commission controls compliance with the requirements. The surveillance of the compliance with the authorisation is very important.

The training courses for DGSAs include 72 hour basic training and supplementary courses if Class1 and Class7 are aimed to be acquired. A 24-hour training course is foreseen when adding to a road DGSA certificate the rail specific training course.

Details concerning the multiple-choice questions and case study were shared. It was explained that the trainees are allowed to use the ADR and RID during the examination, as the important part is that the DGSA knows how to read and use the regulations, not to know them by heart.

The creation and improvement of exam questions was also explained as an important task and the analysis of the teaching process is very important for the examination commission. Suggestions for improving learning or materials can be done.

The supervision of the DGSAs is structured in audits and checks at the enterprises which deal with transportation of dangerous goods. These audits, organised every 5th year, allow for an in-depth analysis of the activities on TDG of enterprises. They are a good way to get enterprises accustomed with checks and to pave the way for safety, including in terms of support addressed to the DGSA in compliance. All inspectors performing such audits/inspections have been trained in control of dangerous goods – basic level of education. Expertise of inspectors performing audit is maintained in internal training and international cooperation, and questionnaires concerning activities of DGSAs are sent to them on a yearly basis.

In conclusion, all participants agreed that appropriate training of DGSA is key to correct implementation of the agreement. The representative of Latvia accentuated that allowing DGSAs to function independently and to serve several companies was an excellent idea because it allowed for further professionalisation of DGSAs.

It was agreed that further follow-up be envisaged, in cooperation with relevant professionals and organisations (e.g. chambers of commerce, DGSA associations etc.)

TC indicated that some information concerning the DGSA rules in some Member States is contained in the Regulated Professions Database³. The representative of Latvia explained that his administration could not include information there because

³ https://ec.europa.eu/growth/tools-databases/regprof/professions/bycountry

	the Regulated Professions were interpreted as regulated by the Ministry of Education
	only in their case.
14.	A representative of the Project Implementation Unit in TC presented the activities
	dedicated to the Observing Participants of the TC. The support developed for the
	progressive integration of Ukraine, Moldova and Georgia is substantial and aims at
	preparing a tailored capacity building program and initiating the implementation
	arrangements for full delivery during 2025. The Action Plans developed for the
	Observing Participants aim to prepare them for further steps. The stakeholders
	engagement is important and several steps were taken to respond to their needs. A
	technical assistance need assessment was performed in April-August 2024, and
	several procurement documents have been developed.
	Observing Participants were encouraged to improve the participation rates in projects
	and to look into ways to improve capacity to this end.
15.	Grenada Demakina, the representative of the Latvian Consumer Rights Protection
	Chair, presented the transposition of Directive 2010/35/EU on transportable pressure
	equipment in Latvia.
	The group was reminded that, as explained in the March session of the TDG
	Committee, all Directives on products have a ADCO Group that the representative of
	Latvia is currently chairing.
	In terms of latest development, TDG authorities need to be aware about the
	developments concerning FGases. Based on Regulation (EU) 2024/573 of the
	European Parliament and of the Council of 7 February 2024 on fluorinated
	greenhouse gases, amending Directive (EU) 2019/1937 and repealing Regulation
	(EU) No 517/2014 ⁴ , a new ADCO has been created and further attention should be
	paid in the future in this direction.
	It was mentioned that DG GROW has been allocating recently funding to support
	market surveillance actions, in particular view to testing tanks and cylinders
	manufactured under TPED. It was observed that the TPED sector is difficult to access

as there are further requirements in the RID and ADR agreements related to use.

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⁴ OJ L, 2024/573, 20.2.2024.

Coordinated actions for market surveillance are performed in several Member States at the same time, for example on products such as small cartridges for camping stoves or cylinders used in domestic cooking.

Market surveillance in Latvia is under the competence of the Ministry of Economy who has the infrastructure for withdrawal from the EU market of products. The RAPEX⁵ and ICSMS⁶ tools were briefly introduced as important cooperation mechanisms and supervision of a broader market than the national one. The activities developed within the EU Product Compliance Network (EUPCN).

This generated further developments in terms of Electronic Customs Data processing (EMDAS) and information for economic operators.

TCT Secretariat thanked for the presentation and drew attention to the participants at the meeting that some of the activities related to market surveillance are covered by CEFTA and that the TPED competent authorities should be following up those developments also.

The Albanian Institute for Industry and Technology (ISHTI) took the floor to restate that there is a need of further capacity building on TPED in their institution and to express hope that TAIEX will accept their request. TC Permanent Secretariat explained that the program was blocked in agreement with DG NEAR until further progress is achieved with the translation of ADR and RID in line with technical and scientific progress. In absence of translation of ADR and RID 2025, the request will be rejected.

The role of the NSA in the field of TDG was presented in the last intervention of the representative of the Latvian State Railway Technical Inspectorate. He presented the complementarity between Directive 2016/798 and Directive 2008/68/EC. Supervising railway undertakings and infrastructure managers is important in safety management systems. Audits are done thematically. The common safety method for monitoring is applied by railway undertakings and measures should be put in place so that they comply with this requirement after receiving the safety certificate.

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⁵ https://ec.europa.eu/safety-gate-alerts/screen/search

⁶ https://webgate.ec.europa.eu/single-market-compliance-space/market-surveillance

In carriage of dangerous goods consignors, loaders etc also need to comply with the regulations and to be made aware about the importance of safety regulations.

Concerning the safety management systems, the representative of ERA also intervened and invited all participants to re-read carefully the informal document INF.7⁷ of the OTIF Standing Working Group in 2021. It is a useful read view to optimisation of NSA activities.

It was agreed that further discussions on NSA activities be organised in the future, eventually view to peer review of systems currently being implemented by different regional partners.

The representative of the TC congratulated the Committee about the activities performed in 2024. Monica Stanciu invited all delegates to go through the presentations of this session in order to assess further activities for the future, in particular in the context of upcoming budgetary discussions.

Based on the activities performed recently, in particular in the last 2 years, it is important that each Regional Partner and Observing Participants develops its own internal strategy concerning transport of dangerous goods and which should be coordinated with other relevant areas such as rules for chemicals or strategies for disaster preparation and relief.

The first and foremost recommendation remains availability of the annexes of international agreements in domestic languages and enhanced capacity of competent authorities, but also of the industry involved – from transport operators to consignors, loaders, fillers, packers, loaders etc.

Further activities for capacity building can be envisaged in the future, but the role of members in international fora remains crucial in sharing knowledge obtained in international cooperation with upper hierarchical levels, horizontally and subordinates as well. All participants in the meeting were invited to always disseminate the results of the meetings they attend in their administration and with stakeholders in other relevant institutions.

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https://otif.org/fileadmin/new/2-Activities/2D-Dangerous-Goods/2Dc2 infdoc StandingWG/2021/RID CE GTP 2021-INF 07 e safety certificate.pdf