

Hauliers who transport goods that are in the scope of ADR probably require the services of a DGSA, a dangerous goods safety adviser. Peter Shakespeare discovers there is more to the role than meets the eye



# The ADR champions

**H**auling dangerous goods is regulated by the European Agreement Concerning the International Carriage of Dangerous Goods by Road, more commonly known as ADR. The relevant UK law is the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (plus 2011 amendment, 2012 derogations and 'transitional provisions'). Separate but similar legislation has been made in Northern Ireland.

Those regulations require operations that "transport, pack, fill, load or unload dangerous goods on a regular basis" to appoint a DGSA, dangerous goods safety advisor, points out the Department for Transport (DfT)'s revised guidance of May 2016 (see link opposite).

It explains that DGSAs manage hauliers' transport of dangerous goods, advising them about safety, monitoring compliance with ADR regulations, preparing an annual performance report, investigating accidents or rulebreaking in the company, and monitoring training and advice. DfT adds that the carrier is generally responsible for dangerous goods loading, placarding (shown above) and

ensuring the driver's competence.

Not every dangerous goods operation requires a DGSA; there are exceptions, depending on the amount of dangerous goods handled, and the frequency of their handling. For example, carrying dangerous goods in so-called limited quantities is one exemption, and mainly refers to hazardous substances destined for the retail supply chain, which are packaged in separate containers. Full details of exemptions, and examples, can be found on the HSE website (<https://is.gd/ocokuf>). DfT says that operations not required to have a DGSA must still use trained staff.

## UN DANGEROUS GOODS CATEGORIES

- 1 Explosives
- 2 Gases
- 3 Flammable liquids
- 4 Flammable solids
- 5 Oxidisers and organic peroxides
- 6 Toxic and infectious substances
- 7 Radioactive material
- 8 Corrosive material
- 9 Miscellaneous dangerous substances

Hauliers have the option to either train one of their own employees to become a DGSA, or they can contract a third party to act as one. Whatever the arrangements, DGSAs are required by DfT to be given sufficient time and resources to carry out their duties properly. That means that operations with more than one site, or that are particularly complex, may require multiple DGSAs.

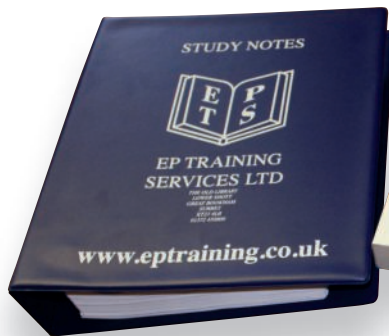
DGSAs demonstrate their competence by holding a certificate gained through a written assessment. In the UK, the examinations are set and administered by the Scottish Qualifications Authority (SQA).

Sean Pargeter, managing director of EP Training Services, explains: "There are three modules. The academic requirement is equivalent to A-level pass standard. The syllabus includes: a 'core' module covering background legislation and requirements; a 'road' module, specific to the provisions of the carriage of dangerous goods by road; and an 'all classes' module dealing with the requirements for each category of dangerous goods. [That] can be replaced with a speciality module – such as explosives or radioactives – but in my experience, the depth of



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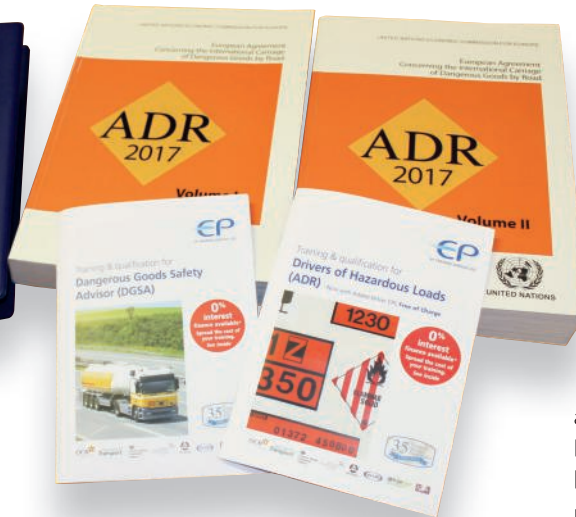


knowledge of the category that the examiners require is often beyond most candidates."

The examination is open book, because candidates must "explain", "give reasons" or "show in full" how they arrived at their solution. Pargeter explains candidates must show what information they based their solution on, and where they found it in the ADR reference books (above, with EP training materials). This is down to volume, page and paragraph references. Due to the demands of the examination, much of the course is spent working through examples, he says.

EP Training Services' course is five days. According to Pargeter, there are around 150 DGSA training providers across the UK, some of which cover air, rail and sea areas, although it only does the road course. Average prices for the 'road' course, including examination fees and VAT, are around £1,500.

Pargeter adds: "We have seen a decline in uptake for DGSA training in recent years, so now work with two other regional providers, taking turns to run the course due to low demand." DfT figures confirm this: nationally there was a steady fall in candidates sitting the examination between 2015 and 2016. In 2015, 813 people sat the examination, compared to 665 in 2016. Average pass rates were 63% and 55% respectively. This year, published results for the first two examinations (there are four a year: March, May, September and November) recorded 381 candidates in



total; the average pass rate was 61%.

Once the qualification has been gained, it is valid for five years, after which renewal is required through further exams. The certificate is valid across the EU and in countries that have signed up to either ADR, RID [covering transport of dangerous goods by rail] or ADN [dangerous goods on waterways].

Pargeter adds: "The difficulty of the examination, a move towards outsourcing the DGSA requirement to consultants and a perceived lack of enforcement, are reasons why fewer DGSAs are being trained. I also question whether transport operators fully understand the requirement."

He concludes: "On a positive note, due to low candidate numbers, generally student/instructor ratios are low."

Other training providers include the British International Freight Association, the Freight Transport Association and the Road Haulage Association (RHA), which also represents members' interests in terms of the storage and carriage of dangerous goods.

RHA's DGSA and manager for logistics development, Nick Deal, says that he gets more calls from members asking to be pointed in the direction of a local DGSA, than about training provision. "The exam is difficult to pass if

the candidate is not suitable," he says. "Also, if they don't particularly want the role, but have been landed with it, or are not given sufficient time to study, it will disadvantage them."

Deal estimates that the number of 'road' qualified DGSAs now floats around the 2,200 mark.

### ENFORCEMENT

Deal says that the police now follow up on ADR-related accidents and contact the company's DGSA. He says they ask to see the DGSA's last annual report. He explains: "The normal procedure in this country is that a PG9 prohibition order is issued for a significant breach. I am only aware of a few cases where fines were issued following court cases for much more serious offences. These have been up to £20,000 for roadside spill incidents. If you operate abroad, then justice is instant, and roadside fines can run into thousands; typically for wrong or no markings and labelling, or poor load safety. Poor load safety will attract a fixed penalty notice in the UK."

According to Deal, there is a general lack of awareness of the requirement for a DGSA in industry. He says that from a general haulier's point of view, it can be difficult to factor in ADR considerations, if it doesn't have access to advice.

Transport managers in doubt about whether they require a DGSA are advised to ask one to conduct an audit. Training providers, consultant DGSAs and the trade associations can provide this service. A haulier involved in a serious incident that did not have a DGSA, but which is judged to have required one, could lose its O licence. [IE](#)

### FURTHER INFORMATION

DGSA syllabus – <https://is.gd/ejayof>

DfT Dangerous Goods Guidance Note 19, May 2016 – <https://is.gd/damadu>

List of DGSA consultants from BADGP – <https://is.gd/imovit>