

## Dangerous goods make the world go round!

truck with UN 1831 SULPHURIC ACID, FUMING 8+6.1 I, in Bolivia:



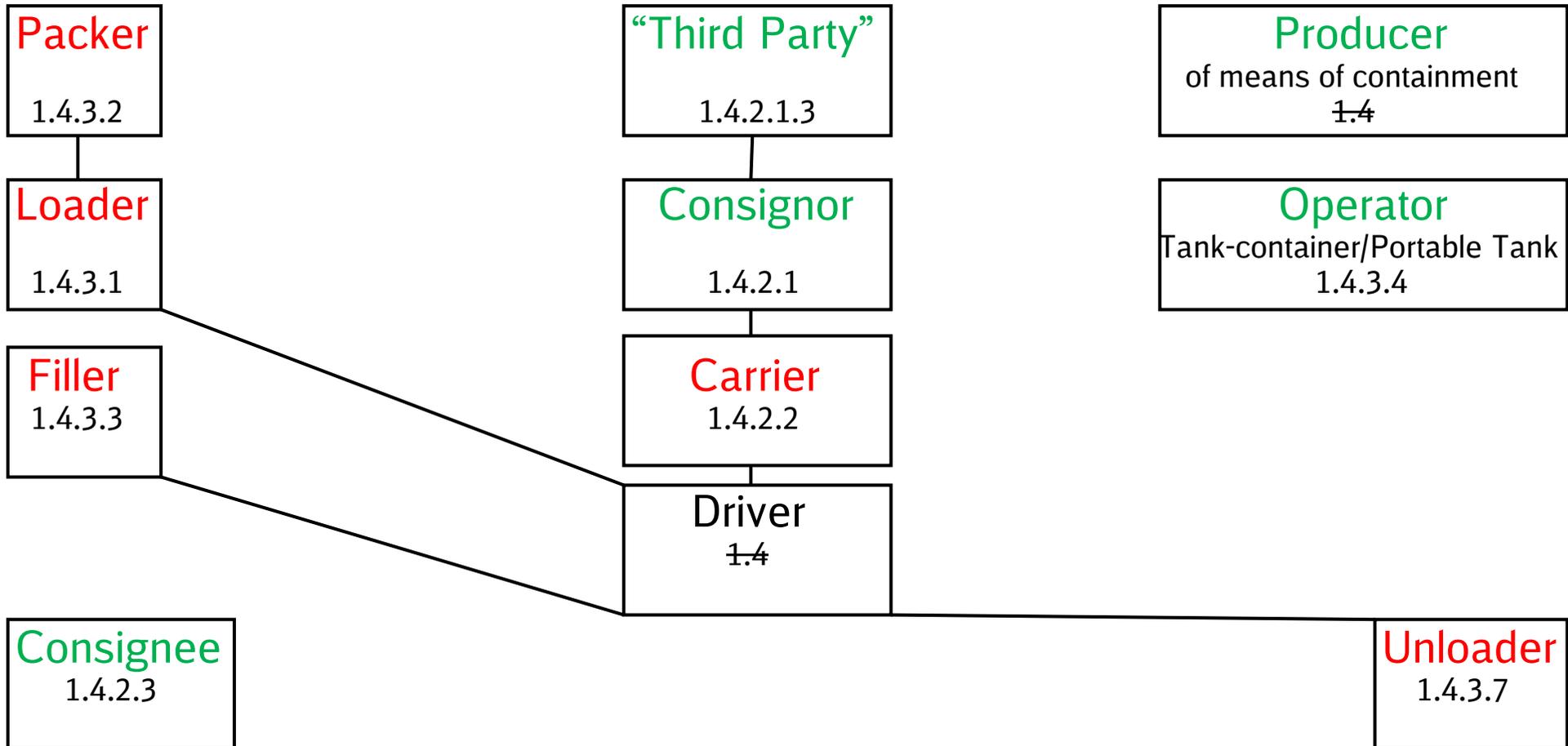
### The Dangerous Goods Safety Adviser (DGSA): Key Figure for Safety & Security

Hellenic Association of Dangerous Goods Safety Advisers (PSSAMEE): Workshop Transport of dangerous goods in the European Market - 30<sup>th</sup> March 2016 - Athens

The Dangerous Goods Safety Adviser (DGSA): Key Figure for Safety & Security

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## The Supply Chain for Dangerous Goods and the Actors



Have to appoint a DGSA (1.8.3.1 ADR) - why not the others???

The correct classification and – as a consequence – the correct and complete transport document is under the responsibility of the **consignor/sender**:

Exemplaire de l'expéditeur Copy for sender		LETTRE DE VOITURE INTERNATIONALE (CMB)		INTERNATIONAL CONSIGNMENT NOTE		Pays/Country		No 24382	
<b>1</b> Expéditeur (nom, adresse, pays) Sender (name, address, country)			<b>6</b> Transporteur (nom, adresse, pays, autres références) Carrier (name, address, country, other references)						
<b>2</b> Destinataire (nom, adresse, pays) Consignee (name, address, country)			<b>7</b> Transporteurs successifs / Successive carriers Nom / Name Adresse / Address Pays / Country Reçu et acceptation / Receipt and Acceptance      Date      Signature						
<b>3</b> Prise en charge de la marchandise / Taking over the goods: Lieu / Place Pays / Country Date Heure d'arrivée / Time of arrival      Heure de départ / Time of departure			<b>8</b> Réserves et observations du transporteur lors de la prise en charge de la marchandise Carrier's reservations and observations on taking over the goods						
<b>4</b> Livraison de la marchandise / Delivery of the goods: Lieu / Place Pays / Country Heures d'ouverture du dépôt / Warehouse opening hours			<b>9</b> Documents remis au transporteur par l'expéditeur Documents handed to the carrier by the sender						
<b>10</b> Marques et numéros Marks and Nos		<b>11</b> Nombre de colis Number of packages	<b>12</b> Mode d'emballage Method of packing	<b>13</b> Nature de la marchandise Nature of the goods		<b>14</b> Poids brut, kg Gross weight in kg		<b>15</b> Cubage m <sup>3</sup> Volume in m <sup>3</sup>	
Numéro ONU UN Number		Nom voir 13 Name see 13	Numéro d'étiquette Label Number	Groupe d'emballage Packing Group		(ADR*) (ADR*)			

We all know that the **classification of DG** often is not correct.

Consignors trust the Material Safety Data Sheets, but what we learnt from REACH-en-force (a.o. checks of MSDS) is that data in section 14 (“transport”) often do not correspond with the data in sections 2, 3, 9, 11, 12 (non plausibility).

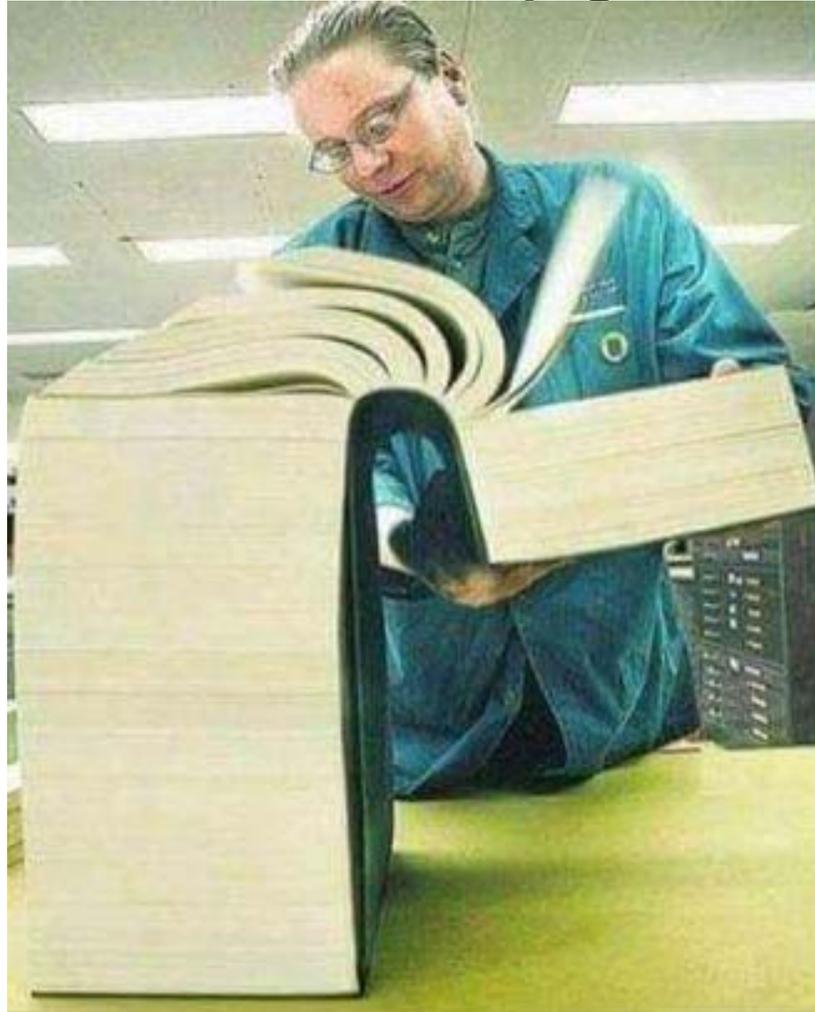
But everything is depending on the **correct** classification:

- correct mean of containment, e.g. packaging, tank
- correct communication (marking/labeling, transport document)
- correct behavior in the case of an emergency (driver, fire brigades)

The originator of the transport, the consignor/sender,

- has a lot of duties by ADR (1.4.2.1)
- but is excluded from the obligation to appoint a DGSA. Why???

## ADR 2015: 1216 pages!!!



## ADR 2051: ????? pages???

The ADR is regulating nearly **everything**:

- classification of substances
- means of containment (packages/tanks) / vehicles:
  - approval
  - packing/filling/loading activities
- communication:
  - marking/labelling of means of containment
  - transport document
  - instructions in writing (“transport emergency card”)
- trainings:
  - driver’s certificate

## How to be compliant with the ADR?

There are two key requirements:

- operational procedures and instructions
- training of the employees

## First key requirement: operational procedures and instructions

The DGSA has to verify that employees involved in the

- carriage

- packing/filling (new as from year 2017!)

- loading/unloading

of dangerous goods have **detailed** (!) procedures and instructions (“SOPs”).

(ADR. 1.8.3.3)

This applies only to companies which have to appoint a DGSA,  
e.g. not for companies consigning/sending DG shipments!

## Second key requirement: training

The DGSA has to verify the

- **proper** (!) training of the company's employees, including on the changes to the regulations
- maintenance of records of such trainings.

(ADR, 1.8.3.3)

This applies only to companies which have to appoint a DGSA, e.g. not for companies consigning/sending DG shipments!

We have a **lot** of training requirements in the ADR.

(1.3, 1.7.2.5, 1.10.2, 3.4.1 sentence 4 a), 3.5.1.1 a), 5.5.2.2, 5.5.3.2.4, 8.2)

## One example for the importance of being trained:

## July 25<sup>th</sup>, 2014: snapshot taken from the CMR consignment note:

Kollanzahl und -art	Inhalt B/L-Deklaration	Bruttogewicht kg Volumen
<b>32 Paletten</b> <b>22 Stellplätze</b>	<b>Toilet preparations</b> <b>UN 1266, class 3, PG II</b> <b>in LQ according ADR 3.4</b>	<b>10523 kg</b>

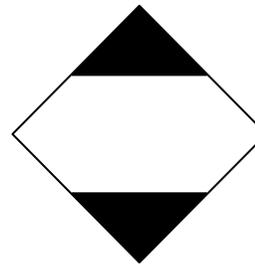
### ADR:

- consignor has to inform the carrier (3.4.9 ADR 2009 / 3.4.12 ADR 2011)
- no obligation to have something specifically in writing on the vehicle!

Loader/driver did not mark the transport unit with

**LTD QTY**

resp.



(3.4.10 a) ADR 2009 / 3.4.13 a) ADR 2011)

# The driver passed the Gotthard Tunnel; consequence:

**ti** POLIZIA DEL CANTONE TICINO 0277  
RM 2

**RICEVUTA IMPORTO A COPERTURA SPESE** 56674

LUOGO: CHIASSO DOGANA COMMERCIALE  
DATA: 25 10/14 ORE: 10<sup>00</sup>  
INFR.: CIRCOLAZIONE GALLERIA SAN GOTTARDO  
NO ONU 1266 classe 3 max 8000  
costo 9069

IMPORTO Fr. **3160** - tre - uno - sei - zero

di cui: \_\_\_\_\_ tasso giudiz. \_\_\_\_\_ VALUTA ESTERA: \_\_\_\_\_

PAGATI CON: CONT.  C.C.  PER: UCE  PP

VEICOLO: SCANIA TARGA: MAX 874 H  
RIMORCHIO: KROVE TARGA: XYU 743 H

COGNOME E NOME: LAPOS, KAROL  
DATA, LUOGO DI NASCITA: 27/7/53, BUDAPEST



NAZIONE: H STATO CIV.: /  
ORIGINE: H PROFESSIONE: autista  
CONIUGE: /  
PADRE: /  
MADRE: /

LIC Nr.: CN 658986 CAT.: C+E D. ESAME: 15/12/78  
RILASCIATA IL: 08 10/14 A: BUDAPEST

  
BOLLO E FIRMA:

**ADR, 3.4.1, 4<sup>th</sup> sentence, (a): chapter 1.3 (training) applies!**

**BUT:** effective July 1<sup>st</sup>, 2015, due to transitional measure in 1.6.1.20!

**Lesson learnt from this case:**

Training is **very, very, very** important!!!

Especially for drivers without an ADR driver training certificate!!!

But a carrier who applies 1.1.3.6 of ADR does not need to appoint a DGSA.  
Who should train these drivers according to 8.2.3 of ADR???

### 3 facts:

- ADR: one for all!
- BUT: different interpretation of provisions
- BUT: sanctions are on national basis; examples from Germany:

What?		Responsible?	Fine in €?
package	approval	packer	800
	marking/labelling	packer	500
documents	transport document	consignor	500
		carrier	500
		driver	150
	instruction in writing	carrier	300
		driver	150
	training certificate	carrier	500
driver		300	
equipment	fire extinguisher	carrier	500
		driver	150
	personal equipment	carrier	800
		driver	150

### In each case: prohibition to continue the trip!

## **BUT:**

The application of the ADR is

- very complicate for non-experts  
e.g.: exemptions & exceptions (“second class DG”),  
not harmonized multi-modally
- something for “freaks”

# Example 1:

IMO DANGEROUS GOODS DECLARATION / VERANTWORTLICHE ERKLÄRUNG		[ ]	
<ul style="list-style-type: none"> <li>This form meets the requirements of SOLAS 74 chapter VII, part A, regulation 4; MARPOL 73/78 Annex III, regulation 4 and the IMDG Code, Chapter 5.4.</li> <li>Dieses Formular erfüllt die Bedingungen der GGVSee § 8 und des IMDG Code Kap. 5.4.</li> </ul>			
Shipper [ ]		1	Reference number(s)
Consignee [ ]		3	Carrier
IRLAND		SCHENKER & CO AG Flughafenstr. 20 A-9020 Klagenfurt AUSTRIA	
<input type="checkbox"/> Container packing certificate / vehicle declaration <input type="checkbox"/> Not applicable		5	
<b>Declaration</b> It is declared that the loading of the goods into the freight container or vehicle has been carried out in accordance with the provisions of 5.4.2.1 IMDG Code.		Name/status, company/organization of signatory  Place and date  Signature on behalf of packer	
Ship's name and voyage No.		6	Container-/Vehicle-Identification No(s).
Port of loading		Seal No(s).	
Port of discharge		7	
<b>Goods:</b>  UN 3149 HYDROGEN PEROXIDE AND PEROXYACETIC ACID MIXTURE, stabilized, Class 5.1 (8), PG II "MARINE POLLUTANT" EmS: F-H, S-Q 1 one fibreboard box = 1 plastic bottle 1 kg net approved type Packing used: 4G/X ..JS/ JJ D/BAM 5513-SCA-RHV  UN 3109 ORGANIC PEROXIDE TYPE F, LIQUID (contains PEROXYACETIC ACID, TYPE F, stabilized) Class 5.2, (8) "MARINE POLLUTANT" EmS: F-J, S-R 1 one fibreboard box = 1 plastic bottle 1 kg net approved type Packing used: 4G/X ..JS/ JJ D/BAM 5513-SCA-RHV  brutto: 8,22 kg                      netto: 6,22 kg		Goods delivered as: 8  <input type="checkbox"/> Breakbulk cargo <input type="checkbox"/> Unitized cargo <input type="checkbox"/> Bulk packages  Type of unit: <input type="checkbox"/> Freight container <input type="checkbox"/> LCL <input type="checkbox"/> FCL <input type="checkbox"/> Open <input type="checkbox"/> Closed  <input type="checkbox"/> Tank container <input type="checkbox"/> Trailer / Vehicle <input type="checkbox"/> Tank vehicle	
ADDITIONAL INFORMATION Emergency contact (24-Hour-Number) +49 [ ] Transport in accordance with 7.2.6.3. of the IMDG Code.			
<b>Declaration</b> I hereby declare that the contents of this consignment are fully and accurately described above by the correct technical name(s) (proper shipping name(s)), and are classified, packaged, marked and labelled/placarded, and are in all respects in proper condition for transport according to the applicable international and national government regulations.		Name/status, company/organization of signatory  Place and date 05.08.2014  Signature [ ]	

## **Standard routing from Austria to Ireland via UK in our company is:**

- either EuroTunnel („Le Shuttle Freight“)
- or combined passenger/freight ferries, e.g. Calais-Dover

**BUT:** UN 3149 + UN 3109 are both

- FORBIDDEN for EuroTunnel
- stowage categories D = only freight ferries are permitted  
→ FORBIDDEN on combined passenger/freight ferries,  
including if only 2 x 1 I !!!

Alternatives:

- repack to Limited Quantities (→ both, EuroTunnel and combined passenger/freight ferries, are PERMITTED)
- or dedicated freight ferry, e.g. Zeebrügge-Hull (= + 850 € extra ...)
- or fly (both UN numbers are PERMITTED, including on combined passenger/freight aircrafts ...)

**Is this logical??? To handle non logical regulations is our daily business!**



**BEFÖRDERUNGSDOKUMENT FÜR GEFÄHRLICHE GÜTER**  
nach § 8 GGVSee (IMO-ERKLÄRUNG)  
**TRANSPORT DOCUMENT FOR DANGEROUS GOODS**  
**(IMO-DANGEROUS GOODS DECLARATION)**

Dieses Formular entspricht SOLAS 74, Kapitel VII Regel 4; MARPOL 73/78, Anlage II, Regel 4 und dem IMDG-Code, Kapitel 5.4  
This form meets the requirements of SOLAS 74, chapter VII regulation 4, MARPOL 73/78, Annex II, regulation 4 and the IMDG-Code, Chapter 5.4

Versender (Name & Anschrift) Shipper (Name & Address)  13409 Berlin Germany		Buchungsnummer(n) Reference number(s)			
Empfänger Consignee  Vanity X Make Up Studio 2nd Floor South Colonnade , The Plaza / Swords Co. Dublin , Ireland		Beförderer Carrier  SCHENKER INTERNATIONAL			
CONTAINER / FAHRZEUG-PACKZERTIFIKAT CONTAINER / VEHICLE PACKING CERTIFICATE  <b>ERKLÄRUNG</b> Es wird erklärt, dass das Packen der gefährlichen Güter in die oder auf die Beförderungseinheit gem. den Bestimmungen nach 5.4.2.1 durchgeführt wurde. <b>DECLARATION</b> It is declared that the packing of the goods into the cargo transport unit has been carried out in accordance with the provisions of 5.4.2.1. <b>AUSFÜLLEN FÜR SENDUNGEN IN CONTAINERN ODER FAHRZEUGEN</b> <b>TO BE COMPLETED FOR SHIPMENTS IN CONTAINERS OR VEHICLES</b>		Container/Fahrzeug-Nr. Container/Vehicle No.  Name/Funktion, Unternehmen/Organisation des Unterzeichners Name/Status, company/organization of signatory  Ort und Datum Place and date Unterschrift für den Packler Signature on behalf of packer			
Schiffname und Nummer der Reise Ship's name and voyage No.		Ladefahrten Port of loading  (Frei für Text, Anweisungen und sonstige Angaben) (Reserved for text, instructions or other marks)			
Umschlagort Port of discharge					
UN-Nr. UN-No.	Inhalt (richtiger technischer Name) Proper Shipping Name (Correct technical name)	Klasse/Unterklasse nach IMDG IMDG-Class	Verpackungsgruppe Packing group	Markierung der Versandeinheit Falls zutreffend, Kennifikations-Nummer oder auch Kennzeichen Marks & Nos, if applicable, identification or registration number(s) of the Unit	Anzahl und Verp.-Art No. and kind of packages
1993	Flammable liquid, n.o.s.(contains ethanol & ethyl methyl ketone) LQ	3	II	address	1 cardboard box
1993	Flammable liquid, n.o.s.(contains acetone and methylmethacrylat, monomer, stabilized) LQ	3	II		2 cardboard boxes
1993	Flammable liquid, n.o.s.(contains ethanol & ethyl methyl ketone) LQ	3	II		2 cardboard boxes
1203	Paint	3	I		2 cardboard boxes
Bruttomenge (Volumen/Masse) Gross quantity (volume/mass) Nettomenge (Volumen/Masse) Net quantity (volume/mass) Netto Explosivstoffmasse Net explosive mass		Merkblatt-Nr. für Unfall-Maßnahmen EMG-No.	Eigenschaften / Properties Flammpunkt / Flashpoint MARINE POLLUTANT Kontroll- und Notfalltemperatur Control- and emergency temperature	Güter angeliefert als / Goods delivered as: <input type="checkbox"/> Stückgut / Breakbulk cargo <input type="checkbox"/> Ladungseinheiten (Unit Loads) <input type="checkbox"/> Unladen cargo <input type="checkbox"/> Ballverpackungen / Bulk packages  Art der Einheit (Container, Anhänger, Tank, Fahrzeug usw.) (Type of unit) (container, tanker, tank, vehicle etc.) <input type="checkbox"/> offen / open <input type="checkbox"/> geschlossen / closed Zusätzliche Anweisungen Insert "X" in appropriate box (Diese Spalte kann bis auf die Überschrift freigelassen werden; in diesem Fall ist die zutreffende Beschreibung einzutragen.) (This column may be left empty apart from the heading, in which case insert appropriate description.)	
5,40 KG G / 3,24 L N 2,70 KG G / 1,62 L N 7,56 KG G / 4,54 L N 5,40 KG G / 3,24 L N		F,E,S-E F,E,S-D F,E,S-E F,E,S-D	+ 13 °C - 18 °C + 13 °C - 40 °C		
* Marken- oder Handelsnamen allein sind nicht ausreichend. Falls zutreffend: (1) das Wort "ABFALL" vor das Namen setzen; (2) "LEER UMSCHLAGEND" oder "RÜCKSTÄNDE - ZULETZT ENTHALTEN" hinzufügen; (3) "BEGREICHTE MENIG" hinzufügen. ** Falls nach Kapitel 5.4 IMDG-Code erforderlich: * Nur bei Stoffen der Klasse 1: - Proprietary/ trade names alone are not sufficient. If applicable: (1) the word "WASTE" should precede the name; (2) "EMPTY UNCLEANED" or "RESIDUE - LAST CONTAINED" should be entered; (3) "LIMITED QUANTITY" should be added. ** When required in chapter 5.4 of the IMDG-Code, * Class 1 only.					
<b>ZUSÄTZLICHE ANGABEN</b> Under certain circumstances special information/notifications are required, see IMDG-Code, chapter 5.4 (see backside). <b>ADDITIONAL INFORMATION</b> In certain circumstances special information/notifications are required, see IMDG-Code, chapter 5.4 (see backside).					
<b>ERKLÄRUNG</b> I hereby declare that the contents of this consignment are fully and accurately described by the Proper Shipping Name and are classified, packaged, marked and labeled/placarded and are in all respects in proper condition for transport according to the applicable international and national governmental regulations.		Name/Funktion, Unternehmen/Organisation des Unterzeichners Name/status, company/organization of signatory  Jens Ziemer, Export Manager  Ort und Datum Berlin, 04.12.2015 Unterschrift für den Versender Signature on behalf of shipper			

## Example 2:

The fire extinguishers shall be subjected to inspections in accordance with authorized **national** standards. (ADR, 8.1.4.4)

These standards are published nowhere officially in a consolidated form.

As a consequence e.g. the German authorities  
- declared to be not able to check sub-section 8.1.4.4 of ADR  
for fire-extinguishers not produced in Germany; example:



“VALID UNTIL 1<sup>st</sup> April 2030” - from Russia with love ...

- do only check sub-section 8.1.4.4 of ADR  
for fire-extinguishers made in Germany...

<b>The fire extinguishers shall be subjected to periodic inspections in accordance with authorized national standards (8.1.4.4 ADR). How long is this period?</b>	
<b>country</b>	<b>year(s)</b>
Austria	2
Belarus	
Belgium	5, than renewal
Bosnia and Hercegowina	0,5
Bulgaria	1
Croatia	1
Czech Republic	1
Denmark	1
Estonia	1
Finland	1
France	1
Germany	2
Greece	1
Hungary	1
Ireland	1
Italy	0,5
Latvia	1
Liechtenstein	2
Lithuania	1
Luxemburg	1
Macedonia	2
Netherlands	1
Norway	1
Poland	2-3*), 1**)
Portugal	1
Romania	1
Russia	1
Serbia	0,5
Slovakia	1
Slovenia	2 / 1
Spain	1
Sweden	1
Switzerland	3
Turkey	0,5 / 2
Ukraine	1
United Kingdom	1

\*) first, \*\*) following

**The same is with the restrictions of tunnels (official consolidation is missing!).**

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## Next BUT:

For the transport of dangerous goods the ADR is not exhaustive.

There are a lot of interfaces to other (EU / national) regulations.

**Examples** are: the transport of

- DG in general: additional provisions in accordance with 1.9.3
- a) & d) ADR: published under <http://www.unece.org/trans/danger/danger.html>:  
10 countries; problem: in their national language, sometimes very complicate,  
*e.g.: The Netherlands, Spain\**
- b) & c) ADR: not published under <http://www.unece.org/trans/danger/danger.html>;  
*e.g.: France, Germany\*, Russia, UK*  
*\* compulsory routes!*
- explosives
- radioactives
- waste

**Result:** A lot of additional requirements addressed to the carrier & driver!  
Who keeps the cross-border driver up to date???

**e.g. radioactives:**

**EU Commission:**

**year 2009:**

Regulation (EU) XXXX/201X “Establishing a Community system for Registration of carriers of radioactive materials”

Draft proposal

Idea: notification of carriers on a central basis

Very very beneficial initiative!

**Year 2014:**

The new Commission unfortunately withdrew the proposal

<http://ec.europa.eu/transparency/regdoc/rep/1/2014/EN/1-2014-910-EN-F1-1-ANNEX-4.Pdf>, no 19:

“No foreseeable agreement. While the EP gave a favourable opinion in December 2013, there has been insufficient support in the Council to reach an agreement on the proposal.”

consequence: trouble with the transport of radioactives (including UN 2908-2911) to/from/through esp. Belgium and Italy continues.

**e.g. waste:**

## **Directive 2008/98/EC “Waste”**

### **Article 26:**

Member States shall ensure that the competent authority keeps a **register** of companies which transport waste on a professional basis.

### **Article 27:**

Minimum standards for activities that require registration shall be adopted ... including elements regarding the **technical qualification** of transport companies.

28 Member States = 28 different regulations: result: big confusion:



country	Does the transport company need a specific notification or license for transport of waste?								marking/placarding of truck	
	domestic transport				cross-border transport <sup>1)</sup>					
	hazardous waste <sup>2)</sup>		non-hazardous waste <sup>2)</sup>		hazardous waste <sup>2)</sup>		non-hazardous waste <sup>2)</sup>			
	disposal	recovery	disposal	recovery	disposal	recovery	disposal	recovery		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
AT	-	-	-	-	-	-	-	-	-	-
BE	x	x	x	x	x	x	x	x	x	-
CH	-	-	-	-	-	-	-	-	-	-
CZ	x	x	-	-	-	-	-	-	-	-
DE	x	x	x	x	x	x	x	x	x	 - 30 x 40 cm - front + rear
DK	x	x	x	x	x	x	x	x	x	-
ES	x	x	x	x	x	x	x	x	x	?
EE	x	x	-	-	x	x	x	x	x	-
FI	x	x	x	x	x	x	x	x	x	-
FR	x > 100 kg/shipment	x > 100 kg/shipment	x > 500 kg/shipment	x > 500 kg/shipment	x > 100 kg/shipment	x > 100 kg/shipment	x > 500 kg/shipment	x > 500 kg/shipment	x > 500 kg/shipment	-
GB	x	x	x	x	x	x	x	x	x	-
IT	x	x	x	x	x	x	x	x	x	 - 40 x 40 cm - if hazardous - rear
LU	x	x	x	x	x	x	x	x	x	-
NL	x	x	x	x	x	x	x	x	x	-
PL	x	x	x	x	-	-	-	-	-	-
SE	x	x	x	x	x	x	x	x	x	-
SI	x	x	x	x	x	x	x	x	x	-

**Notes:**

1) The carrier(s) must be indicated in the  
 - „notification document for transboundary movements of waste“ (= box 8 of annex IA of the *Regulation (EC) No 1013/2006*)  
 - “movement document for transboundary movements of waste” (= box 8 of annex IB of the *Regulation (EC) No 1013/2006*)  
 - “accompanying information” (= box 5 of annex VII of the *Regulation (EC) No 1013/2006*)  
 The indication of a “registration number” is only necessary in such cases, where an EU member state requires the registration of waste carriers by number.

2) In accordance with *Decision 2000/532/EC* (= European Waste Catalogue with the six-digit waste code numbers), amended by *Decision 2014/955/EU*.

General: The registration/notification/license of a transport company in one country does not substitute a registration/notification/license of a transport company in another country in general.

For international (cross-border) carriers it is very complicate to identify and follow the resp. requirements!

Example: You intend to transport waste from/to/through Germany???

If the waste is

- not hazardous the carrier needs to be notified only:

[https://einreichen.eaev-formulare.de/intelliform/forms/AbfAEV/AbfAEV/Anzeige\\_53/index](https://einreichen.eaev-formulare.de/intelliform/forms/AbfAEV/AbfAEV/Anzeige_53/index)

- hazardous the carrier needs a full license:

[https://einreichen.eaev-formulare.de/intelliform/forms/AbfAEV/AbfAEV/Antrag\\_54/index](https://einreichen.eaev-formulare.de/intelliform/forms/AbfAEV/AbfAEV/Antrag_54/index)

“Of course” only available in the German language ...

In both cases the truck needs to be marked in the front and in the rear with an “A” (= “Abfall” = waste).

## **The Dangerous Goods Safety Adviser (DGSA): make a long story short:**

1991: DG *Supervisor* Regulation in Germany (“GbV”) became applicable: 1 country

2000: DG *Safety Adviser* EC Directive (“96/35”) became applicable: 15 countries

2003: DGSA section in ADR (“1.8.3”) became applicable: now 48 countries!!!

## The European Association of Dangerous Goods Safety Advisers (EASA)

- was founded in year 2009 / was relaunched in year 2014

- is the Head of 23 Associations of DGSA from 19 countries with > 3000 DG professionals

- intends to act as the central voice of the interests of DGSA in Europe:

### **Our mission: The DGSA is**

→ **the connecting link between the provisions and the applicants**

→ **not only a job but a profession of highly specialized experts**

- obtained consultative status at UN (Joint Meeting) in spring 2015 restricted to DGSA related matters

- made proposals for improvements of section 1.8.3 of ADR/RID/ADN

- **Our vision: Simplification of provisions will increase the**

→ **comprehension**

→ **acceptance**

→ **as a consequence safety & security of the transport of DG**

- kindly asks for support from all national delegations.

## EASA members:

country	name of Association	abbreviation	chairperson	www	contact	number of members
(1)	(2)	(3)	(4)	(5)	(6)	(7)
Austria	Gefahrgutverein Österreich	GVA	Gerhard Mayer	<a href="http://gefahrgutverein.at">http://gefahrgutverein.at</a>	<a href="mailto:office@gefahrgutverein.at">office@gefahrgutverein.at</a>	60
Belgium	Belgian Safety Advisers Association	BESAA	Carol Bailleul	<a href="http://www.besaa.be">http://www.besaa.be</a>	<a href="mailto:esa-li@besaa.be">esa-li@besaa.be</a>	55
Czech Republic	Asociace bezpečnostních poradců a znalců, o.s.	ABPZ	Vladimír Zelený	<a href="http://www.dgsa-rid.cz/">http://www.dgsa-rid.cz/</a>	<a href="mailto:zelenyvl@seznam.cz">zelenyvl@seznam.cz</a>	110
	ADR/RID Chamber of Safety Advisers	ADR/RID CSA	Jiri Dosek		<a href="mailto:dosek@dekra.cz">dosek@dekra.cz</a>	50
Denmark	Foreningen af Sikkerhedsraadgivere i Danmark	FASID	Tine Lykke Thomsen	<a href="http://www.fasid.dk">http://www.fasid.dk</a>	<a href="mailto:info@fasid.dk">info@fasid.dk</a>	140
Finland	Suomen Turvallisuusneuvonantajat	TNA	Riku Lämsivuori	<a href="http://www.tna.fi">http://www.tna.fi</a>	<a href="mailto:tna@tna.fi">tna@tna.fi</a>	181
France	Association Nationale des Conseillers à la Sécurité	ANCS	Thérèse Carbonne	<a href="http://www.conseillersecurite.org/">http://www.conseillersecurite.org/</a>	<a href="mailto:therese@conseillersecurite.org">therese@conseillersecurite.org</a>	434
Germany	Gefahrgutverband Deutschland	GGVD	Hubert Glock	<a href="http://www.ggvd.de/">http://www.ggvd.de/</a>	<a href="mailto:vorstand@ggvd.de">vorstand@ggvd.de</a>	260
Greece	Hellenic Association of Dangerous Goods Safety Advisers	PSSAMEE	Christos Seretidis	<a href="http://www.pssamee.gr">http://www.pssamee.gr</a>	<a href="mailto:info@pssamee.gr">info@pssamee.gr</a>	27
Hungary	Biztonsági Tanácsadók Nemzetközi Szakmai Egyesülete	BTE	Nagy Zsolt	<a href="http://www.bte.hu">http://www.bte.hu</a>	<a href="mailto:elnok@bte.hu">elnok@bte.hu</a>	240
Ireland	The Dangerous Goods Safety Advisers' Association of Ireland	DGSAAI	J.J. Tobin	<a href="http://dgsaai.ie">http://dgsaai.ie</a>	<a href="mailto:chairperson@dgsaai.ie">chairperson@dgsaai.ie</a>	34
Luxemburg	Verband der Gefahrgutlogistik Luxemburg	VGL	Roman Elsen		<a href="mailto:g.zens@te-gl.eu">g.zens@te-gl.eu</a>	30
Netherlands	Vereniging voor Veiligheidsadviseurs Vervoer Gevaarlijke Stoffen	VVA	Wim van Dongen	<a href="http://www.veiligheidsadviseurs.org/">http://www.veiligheidsadviseurs.org/</a>	<a href="mailto:wimvandongen@veiligheidsadviseurs.org">wimvandongen@veiligheidsadviseurs.org</a>	550
Norway	Forening For Sikkerhedsraadgivere I Norge	FFSN	Vidar Berg Eriksen	<a href="http://www.ffsn.no/">http://www.ffsn.no/</a>	<a href="mailto:vidar@ssgr.no">vidar@ssgr.no</a>	71
Poland	Europejskie Stowarzyszenie Doradców ADR	ESD ADR	Tadeusz Horoszkiewicz	<a href="http://www.esd-adr.pl/">http://www.esd-adr.pl/</a>	<a href="mailto:t.horoszkiewicz@esd-adr.pl">t.horoszkiewicz@esd-adr.pl</a>	30
	Europejskie Stowarzyszenie na rzecz bezpieczeństwa operacji transportowych	ETOS	Marek Rozycki	<a href="http://www.etos.org.pl">www.etos.org.pl</a>	<a href="mailto:m.rozycki@mdrk.eu">m.rozycki@mdrk.eu</a>	35
	Stowarzyszenie Doradców ds. Transportu Towarów Niebezpiecznych	SDGSA	Maria Nicopulos	<a href="http://www.s-dgsa.pl/">http://www.s-dgsa.pl/</a>	<a href="mailto:maria.nicopulos@s-dgsa.pl">maria.nicopulos@s-dgsa.pl</a>	100
Slovakia	Zväz Logistiky a Zasielateľstva	ZLZ	Ivan Pobjecký	<a href="http://www.zlz.sk/en/sections-of-association.html">http://www.zlz.sk/en/sections-of-association.html</a>	<a href="mailto:pobjecky@mail.t-com.sk">pobjecky@mail.t-com.sk</a>	98
Spain	Asociacion Consejeros de Seguridad de Aragon	ACONSA	Javier Saez	<a href="http://www.aconsa.org">http://www.aconsa.org</a>	<a href="mailto:informacion@aconsa.org">informacion@aconsa.org</a>	
	Asociacion Vasca de Consejeros de Seguridad	ACONSENA	Jesus Pellejero	<a href="http://www.aconsena.org">http://www.aconsena.org</a>	<a href="mailto:info@aconsena.org">info@aconsena.org</a>	510
Switzerland	Verband Schweizerischer Gefahrgutbeauftragter	VSGGB	Stefan Jenny	<a href="http://www.vsggb.ch/">http://www.vsggb.ch/</a>	<a href="mailto:stefan_jenny@vsggb.ch">stefan_jenny@vsggb.ch</a>	27
Turkey	Tehlikeli Madde Güvenlik Danışmanları ve Eğitimcileri Derneği	TMGDER	Ernaıl Hayırlı	<a href="http://www.tmgder.org">http://www.tmgder.org</a>	<a href="mailto:ernail@tehlikelimadde.com">ernail@tehlikelimadde.com</a>	21
United Kingdom	British Association of Dangerous Goods Professionals	BADGP	Caroline Raine	<a href="http://www.badgp.org/">http://www.badgp.org/</a>	<a href="mailto:chairman@badgp.org">chairman@badgp.org</a>	110
19	23					> 3.000

<http://easa-dg.eu/wp/?lang=en>

## **EASA board:**

- president: Norbert Mueller, delegate from GGVD, Germany
- vice president: Jesus Pellejero, delegate from ACONSENA, Spain
- general secretary: Gaston Zens, delegate from VGL, Luxemburg
- deputy secretary: Francois-Xavier Carbonne, delegate from ANCS, France
- treasurer: Wim van Dongen, delegate from VVA, The Netherlands
- deputy treasurer: Maria Nicopulos, delegate from SDGSA, Poland

## What did EASA propose to the Joint Meeting ADR/RID/ADN 14-18 March 2016?

### Proposal 1:

1.3.2.5 The trainer shall hold a vocational training certificate according to 1.8.3.7.

**Result: NOT AGREED.**

### Proposal 2:

**1.8.3.1** Each undertaking, the activities of which include the consigning (including third parties), carriage, or the related operations packing, loading, filling or unloading, of dangerous goods by road/rail/inland waterways [RID: or operating a tank-wagon] shall appoint one or more safety advisers, hereinafter referred to as “advisers”, for the carriage of dangerous goods, responsible for helping to prevent the risks inherent in such activities with regard to persons, property and the environment.

**Result: AGREED, BUT TRANSITIONAL PERIOD IS REQUIRED.**

### Proposal 3:

**1.8.3.2** The competent authorities of the Contracting Parties may provide that these requirements shall not apply to undertakings:

(a) the activities of which concern quantities in each transport unit smaller than not exceeding those referred to in 1.1.3.6 1.7.1.4 and in Chapters 3.3, 3.4 and 3.5; or ...

**NOTE 1** *1.8.3.2 a) is not applicable to consignors whose activities concern quantities not exceeding those referred to in 1.1.3.6.*

**NOTE 2** *1.8.3.2 a) is not applicable to carriers of dangerous goods in limited quantities exceeding the limit prescribed in 3.4.13.*

**Result: NOT AGREED.**



<b>DGSA TASKS</b>				
	<b>Task</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>
<b>1</b>	Are there procedures for compliance with the requirements governing the identification of dangerous goods being transported?			
<b>2</b>	Does the undertaking's practice take into account, when purchasing means of transport, of any special requirements in connection with the dangerous goods being transported?			
<b>3</b>	Are there procedures for checking the equipment used in connection with the carriage loading or unloading of dangerous goods?			
<b>4</b>	Is there proper training of the undertaking's employees, and the maintenance of records of such training?			
<b>5</b>	Is there implementation of proper emergency procedures in the event of any accident or incident that may affect safety during the carriage, loading or unloading of dangerous goods?			
<b>6</b>	Is there investigation and, where appropriate, preparation of reports on serious accidents, incidents or serious infringements recorded during the carriage, loading or unloading of dangerous goods?			
<b>7</b>	Is there the implementation of appropriate measures to avoid the recurrence of accidents, incidents or serious infringements?			
<b>8</b>	Is account taken of the legal prescriptions and special requirements associated with the carriage of dangerous goods, in the choice and use of sub-contractors or third parties?			
<b>9</b>	Is there verification that employees involved in the carriage, loading or unloading of dangerous goods have detailed operational procedures and instructions?			
<b>10</b>	Is there the introduction of measures to increase awareness of the risks inherent in the carriage, loading and unloading of dangerous goods?			
<b>11</b>	Is there the implementation of verification procedures to ensure the presence on board the means of transport of the documents and safety equipment which must accompany transport and the compliance of such documents and equipment with the regulations?			
<b>12</b>	Is there the implementation of verification procedures to ensure compliance with the requirements governing loading and unloading?			
<b>13</b>	Does a security plan as indicated in 1.10.3.2 exist?			
<u>Comments:</u>				
The report is prepared by:				
Adviser's name and surname		Adviser's certificate code	Adviser's signature	Date of preparation
			signature of responsible person of undertaking	

**Result: AGREED ONLY IF NOT MANDATORY.**

**Proposal 5:**

**1.8.3.3** ... Such annual reports shall be preserved for five years and made available to the national authorities at their request. The adviser's duties also include monitoring the following practices and procedures relating to the relevant activities of the undertaking:

- ...

- verification that employees involved in the consigning, carriage, packing, filling, loading or unloading of dangerous goods have detailed operational procedures and instructions, ...

**Result: AGREED.**

**Proposal 6:**

**1.8.3.14** The competent authority or the examining body shall keep a public running list of the harmonised questions that have been included in the examination.

**Result: NOT AGREED.**

**If the delegates are not yet able to vote in favour, EASA offers to initiate an informal working group both on the harmonisation of existing catalogues of examination questions, and on harmonised examination conditions, including a standard minimum threshold for a successful examination pass.**

**Result: NOT AGREED.**

*Justification: This is to harmonize the tresholds which are at the moment as follows:*

<u>country</u>	<u>minimum treshold for passing exam in % at the moment</u>					
	<u>50</u>	<u>60</u>	<u>64</u>	<u>70</u>	<u>80</u>	<u>90</u>
<u>Austria</u>		<u>X + exam in oral</u>			<u>X</u>	
<u>Belgium</u>		<u>X</u>				
<u>Bulgaria</u>					<u>X</u>	
<u>Czech Republic</u>					<u>X + exam in oral</u>	<u>X</u>
<u>Denmark</u>		<u>X</u>				
<u>Finland</u>				<u>X</u>		
<u>France</u>		<u>X</u>				
<u>Germany</u>	<u>X</u>					
<u>Hungaria</u>		<u>X</u>				
<u>Ireland</u>			<u>X</u>			
<u>Liechtenstein</u>					<u>X</u>	
<u>Luxemburg</u>	<u>X</u>					
<u>Netherlands</u>				<u>X</u>		
<u>Norway</u>					<u>X</u>	
<u>Poland</u>					<u>X</u>	
<u>Portugal</u>	<u>X</u>					
<u>Slovakia</u>					<u>X</u>	
<u>Sweden</u>		<u>X</u>				
<u>Switzerland</u>		<u>X*)</u>		<u>X*)</u>		
<u>Serbia</u>					<u>X</u>	
<u>Spain</u>	<u>X</u>					
<u>Turkey</u>				<u>X</u>		
<u>United Kingdom</u>			<u>X</u>			
<u>∑</u>	<u>4</u>	<u>5-6</u>	<u>2</u>	<u>3-4</u>	<u>7</u>	<u>1</u>

*\*) depending on training service provider.*

*With respect to 1.8.3.15 this situation could not be accepted any longer.*

**Proposal 7:**

**1.8.3.16.1 ...** It is not mandatory for the candidate to complete a training course.

**Result: NOT AGREED.**

**Proposal 8:**

**1.8.3.18 ...** Valid until ..... for undertakings which transport dangerous goods and for undertakings which carry out related consigning, packing, filling, loading or unloading: ...

**Result: AGREED.**

