

A Guide to Handling Dangerous Goods Shipments



One area that the BIFA Secretariat receives regular questions about relates to the handling of dangerous goods. From the questions received, it is clear that there is a lack of understanding regarding the regulations, staff training requirements and how to handle Dangerous Goods shipments.

This brief overview seeks to clarify:

- What Members need to consider when handling Dangerous Goods
- The main Regulations governing the transportation of Dangerous Goods

Given changing technology, an increasing number of everyday items are hazardous e.g. items containing lithium batteries. Dangerous Goods shipments involve the application of additional requirements exceeding those required for non-hazardous goods.

Dangerous Goods are items that may endanger the safety of people, the conveyance, equipment and the environment. Dangerous Goods are also known as restricted articles, hazardous materials and dangerous cargo. Many Freight Forwarding and Transport contracts specifically exclude Dangerous Goods or place additional requirements on the contracting parties.

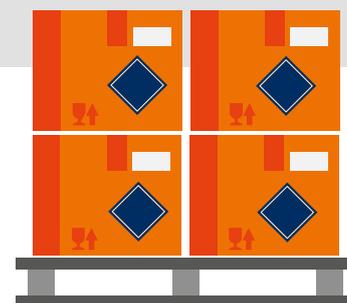
Clause 15 of the BIFA STC states: "Except pursuant to instructions previously received in writing and accepted in writing by the Company, the Company will not accept or deal with Goods of a dangerous or damaging nature."

Forwarders concerned by the additional costs and liabilities may seek to avoid the carriage of Dangerous Goods. However, this can lead to problems because of the risks relating to mis-declared and undeclared dangerous goods which Members may inadvertently handle if staff are not trained to identify such shipments.

Also, the reader should remember that the financial penalties and damage to reputation can be significant for breaching the Regulations. However, by declining dangerous goods shipments Members are reducing their business opportunities.

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Regulatory Overview

The UN Modal Regulations put the rules for the different transportation methods into a classification system. This system assigns each dangerous substance or article a class that defines the type of danger the substance presents.

The packing group then further classifies the level of danger and together with the class dictates how dangerous goods are packaged, labelled and carried. This includes specifying the inner and outer packaging, the suitability of packaging materials and the marks and labels they must bear.

Separate legislation exists for the different modes of transport although there is a degree of compatibility between the modes. Generally, the preparation of Dangerous Goods for Air or Sea movements will ensure compliance with Road transport regulations when being transported to/from Airports or Sea Terminals.

The main regulations are: -

- ADR Carriage of Dangerous Goods by Road applies to all road transport journeys
- RID Carriage of Dangerous Goods by Rail applies to all rail transport journeys
- IMDG Carriage of Dangerous Goods by Sea includes domestic and international journeys
- IATA Carriage of Dangerous Goods by Air applies to all shipments by air, domestic and international
- Tunnel Regulations: For Road and Rail are now included in ADR/RID

It should be noted the Channel Tunnel has its own specific Regulations, which are separate and should not be confused with the Tunnel Regulations

United Kingdom only

For the UK, the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations of 2009 and 2011 and the related derogations, confirm the national variations from the ADR regulations.

Enforcement of Dangerous Goods regulations

Different authorities are responsible for enforcing the regulations for transport by road, air, sea and rail: -

- Road - The Health & Safety Executive (HSE), the Office for Nuclear Regulation (ONR), and the Department for Transport (DfT), in conjunction with the police and the Driver and Vehicle Standards Agency (DVSA), are the enforcement authorities in Great Britain. For International road movements under the ADR European Agreement, each national authority en route enforces its own requirements.
- Air - Nationally, the Civil Aviation Authority (CAA) is the agency responsible for matters related to compliance for goods offered to airlines for carriage by air.
- Sea - The Maritime and Coastguard Agency (MCA) is responsible nationally for matters related to compliance for goods moving by sea.
- Rail - The HSE, Office of Rail Regulation (ORR), ONR and DfT are the enforcement authorities covering rail transport in Great Britain.

Responsibilities

If you trade in or move Dangerous Goods, the goods must be properly packed, marked, labelled and documented, as defined in the relevant Regulations. All parties must also be aware of their wider obligations as defined, relative to areas such as training, etc.

The main parties in the supply chain are:

- Consignor
- Domestic haulier
- Freight forwarder
- International modal carrier, including the international haulier

Consideration should be given to defining role specific responsibilities within organisations, in particular focusing on the important role of Directors to ensure compliance with the Regulations.



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The Main Classes of Dangerous Goods

If a substance is found to meet the classification criteria for any of the 9 classes of dangerous goods, the transport of the goods must comply with the dangerous goods regulations for the mode(s) of transport used. Samples of the labels are shown below and reference should be made to the relevant modal regulations to ensure accuracy.

<p>Class 1</p>  <p>Explosives</p>	<p>Class 2</p>  <p>Gases</p>	<p>Class 3</p>  <p>Flammable liquids</p>
<p>Class 4</p>  <p>Flammable Solids, Other Flammable Substances</p>	<p>Class 5</p>  <p>Oxidizing Substances and Organic Peroxides</p>	<p>Class 6</p>  <p>Toxic and Infectious Substances</p>
<p>Class 7</p>  <p>Radioactive Material</p>	<p>Class 8</p>  <p>Corrosive Substances</p>	<p>Class 9</p>  <p>Miscellaneous Dangerous Substances</p>

Marking and labelling

As well as modal requirements specific to their transportation, suppliers of dangerous goods are required by law to label their hazardous products and packaged chemicals with hazard symbols, warnings and safety advice for the final user. These Safety labelling requirements may vary between countries.

Documentation

When dangerous goods are transported, the consignment must be accompanied by a Transport Document declaring the description and nature of the goods. Documentation must be in accordance with the specifications set by the dangerous goods regulations applicable to the chosen mode of transport. The transport document must be completed by the consignor (the person or organisation from whom the goods have been received for transport).

Goods Description

Whichever mode is used, all dangerous goods must be described on the required documentation in the same order, which is:

- The United Nations [UN] Number
- The Proper Shipping Name
- The Class
- The Packing Group [if assigned]

Role of the DGSA

In order to comply with the ADR Regulations, businesses that handle, process or transport dangerous goods on a regular basis must appoint a Dangerous Goods Safety Advisor (DGSA). In the UK the enforcement of this requirement is achieved via the Health and Safety at Work Act 1974. There are some exemptions which are defined in the legislation.

The role of the DGSA includes advising the business on the transport of dangerous goods, monitoring compliance, procedures & safety measures and where appropriate investigating and compiling reports on accidents or emergencies involving Dangerous Goods.

Training

On a wider note current Health and Safety legislation requires that staff are properly trained for their roles in any business - Dangerous Goods Regulations require that staff involved shall have been trained for that specific activity.

The Regulations require that all staff involved in the preparation or handling of dangerous goods, receive as a minimum an 'Awareness' training. This will assist in identifying the training necessary to undertake a specific activity. Training courses are run by independent providers and trade associations for each mode of transport.

Levels of Training

In general terms, the following may be considered appropriate training categories:

- Awareness
- Technical for each transport mode
- DGSA qualification

It is strongly recommended that training should provide guidance on which questions to ask as part of the initial booking process both to meet the requirements of the applicable modal regulations and to identify mis-declared or undeclared dangerous goods.

Operational procedures

Companies handling or arranging the shipment of Dangerous Goods should be aware of their wider responsibilities. Consideration should be given, but not limited, to the following areas:

- Contractual process for accepting such consignments
- Internal communication
- Training requirements
- Physical layout of the facility including signage, provision of a bund etc
- Receipt, handling and storage procedure
- Documentary processing requirements
- Levels of responsibility
- Risk assessments
- Provision of Personal Protective Equipment
- Specialised handling equipment
- Additional safety related equipment
- Emergency Procedures

Insurance

It is important to advise your Insurers that you are handling Dangerous Goods to ensure that you have adequate cover.

Conclusion

This guidance highlights the main points to consider when handling DG shipments and hopefully indicates our initial premise that handling such consignments, whilst imposing additional requirements to handling general cargo, is not unduly onerous.



The key points that we would like to emphasise are the importance of understanding and complying with the appropriate Regulations and the importance of Training.

N.B. all images of labels are for indicative purposes only and reference should be made to the relevant current DG Manuals and Regulations.