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BADGP NEWSLETTER

The official newsletter of the
British Association of Dangerous Goods Professionals

WELCOME

BY MARK SPENCE, CHAIR OF BADGP

Welcome to Newsletter 42 – and we're off, again. A big thank you to Richard Masters for his webinar on the 2023 IMDG Code Update. It was very informative and, as in all the cases when there is an expert speaking on the subject, I always learn something new about a topic I thought I knew well. I recommend catching up with the recordings on the website if you missed it. If you have any suggestions for a webinar, please let us know.

The AGM & Industry Seminar is fast approaching (March 9th if you haven't booked yet, there are a few places left) and I was quite humbled when the DfT moved their meeting as it clashed with the AGM. It's good to know they think so well of us. There are great speakers on a variety of subjects around a 'future fuels' theme and there will be a discussion/networking segment as at the AGM. We have a record 8 sponsors this year (thank you to all of them for their support) and we have guests from a number of different organisations that we are looking to increase links with. Our visibility is growing, and we are always looking for additional opportunities to 'spread the good word'!

Looking further ahead, we are planning a Class 1 seminar in the summer, at least 5 more webinars and are attending MultiModal at the NEC (June 13th – 15th) again.

As usual, we have a mixed bag of articles with our regular feature on different aspects of the 'challenges' around Lithium batteries, though I'd not heard about battery powered cranes before. Thank you to all our contributors.

If you are interested in getting involved with the running of BADGP, we have several spaces available on the committee. Please let me know if you want more details.

So, get a receptacle of your beverage of choice, sit back and enjoy the newsletter.

Stay Safe

Mark Spence

Chair

STAY CONNECTED

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IN THIS EDITION:

- 3 **Battery Powered Crawler Crane**
- 5 **Dangerous Goods Safety Advisors**
- 8 **CLP: EC Proposes Major Overhaul Of Chemical Labelling Including Minimum Font Sizes**
- 13 **Dangerous Goods Through The Channel Tunnel**
- 15 **LQ Packaging - Is, 'Don't Sweat The Small Stuff' Bad Advice?**
- 19 **Past Experiences With Dangerous Goods**
- 22 **DGSA Training Standards For Class 7**
- 23 **NDGTC AGM 2023 With A Security Twist**
- 25 **Dangerous Goods Awareness Training Session Plan**
- 30 **BADGP December 2022 Issue Quiz - Answers**
- 32 **BADGP Golf Event**
- 33 **Who Are You?**
- 35 **BADGP Webinars And Events**
- 36 **News From Our Partners**

British Association of Dangerous Goods Professionals—BADGP

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Newsletter Contributions

Many thanks to everyone who contributed articles for this Newsletter. We are publishing our Newsletters every 2 months, so our next edition will be out sometime in April 2023.

We welcome articles from any interested party—you **do not need to be a member of BADGP to submit an article**. If you would like to submit something, please do so, just bear in mind they must not be overtly “salesy”, but you can of course mention your company name and contact details.

Please submit articles, together with any photos or graphics, etc. to enquiries@badgp.org.

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Do please feel free to pass this Newsletter on to any other person who may be interested in its contents, as long as the Newsletter is passed on in its entirety.

Disclaimer:

BADGP relies on contribution of content for our Newsletters but is unable to review the content of the articles presented in this Newsletter for accuracy and reliability. The articles are the views of the stated authors and do not necessarily represent the views of BADGP or the Committee members.

BATTERY POWERED CRAWLER CRANE

Author: Dan Lee, BADGP Committee member and of Dan Lee Training Limited

The HS2 project has taken delivery of their first lithium battery powered crane. One of our members got the job of advising on its transport to the site and the question asked was – if it's loaded onto the back of an open trailer – does ADR apply to the crane that is now a load?



“Dan Lee BADGP Committee Member shares an experience and development in the rapidly expanding world of battery-powered vehicles.”

UN3171 relates to battery – powered vehicles although at the time of this being permitted entry into the ‘UN Orange Book’ I don’t think anyone of the dangerous goods experts envisioned a vehicle this size.

According to the manufacturer, Liebherr, there are only 5 of these battery powered crawler cranes in the world.

The question we were asked was – are these vehicles subject to ADR as battery-powered vehicles.

The devil – as they say – is in the detail and in this regard the detail can be found in the special provisions. Four special provisions are detailed in the dangerous goods list under the UN3171 entry: SP388 666, 667 and 669. Special Provisions 388 and 666 are valid for this type of vehicle.



SP388 explains that vehicles are self-propelled apparatus designed to carry one or more persons or goods – the examples given do not include crawler cranes but does include construction vehicles– but the special provision goes onto to state that the batteries and other dangerous goods are not subject to the requirements of ADR provided that all such equipment is properly secured within the vehicle: naturally these are.

SP666 states that all batteries must conform to the testing requirements as laid out in the UN Manual of Tests and Criteria 38.3. as detailed at ADR 2.2.1.9.7 a).

Liebherr are a German company, and this item was delivered to the UK from Europe and as we are an island state – we need to consult the IMDG code as this crawler crane is a bit on the big side to go through the Eurotunnel.

The IMDG code repeats Special Provision 388 but adds 3 additional special provisions in their '900' series: 961, 962 & 971.

SP961 further confirms that vehicles are subject to the provisions of this code if any of the 5 listed conditions are met. The 5th condition states that vehicles powered by a battery must be protected from short circuit.

SP962 states that where the 5 conditions of SP961 can't be met then the battery powered vehicles are to be shipped as Class 9 dangerous goods but that the marking, labelling, placarding and marine pollutants requirement shall not apply.

SP971 States that the battery shows no sign of leakage and is protected from short circuit – which if confirmed exempts the vehicle from the IMDG Code.

What have we learnt from all of this? The easiest answer to give to the posed question – is a lithium-battery powered crane subject to the requirements of the dangerous goods code is to say 'No': but we are dangerous goods professionals and the correct answer to the question is to pose a question in response, example:

'Are the installed batteries protected from short-circuit, if so – how? Because if they are then an exemption can be applied and additionally you would need to confirm that the batteries have been inspected and are not showing any signs of leakage. If we can satisfy these two criteria, then the shipment will be exempt from road and sea DG codes.'



That's how it stands now but expect some changes. The fire and subsequent sinking of the Car Carrier Vessel Felicity Ace in 2022 is causing much discussion about the validity of the existing controls for shipping the new generation of electrically powered vehicles and there are still organisations and shipping lines that insist on exempted dangerous goods still being declared by a DGN.



There are, of course, some companies / organisations that still insist on declaring a vehicle as full DG. The important message from this article is that as DG professionals we need to consider both the road and sea aspects of a journey where an item has or is coming from or to Europe. At BADGP we try and promote the practical and sensible approach of DG professionals taking the step into the world of IATA and IMDG and our first webinar this year sees one of our most experienced IMDG experts, Richard Masters, provide us with valuable insight into the world of DG by sea. Please lend it your support and if you haven't done so already – set a personal development objective to get yourself on an IMDG initial course.

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DANGEROUS GOODS SAFETY ADVISORS

Author: Peregrine Storrs-Fox, Risk Management Director, Through Transport Mutual Services (UK) Ltd for TT Club

The European Agreement Concerning the International Carriage of Dangerous Goods by Road (ADR) states that it was necessary to appoint a Dangerous Goods Safety Advisor (DGSA) no later than 31 December 2022. TT Club risk management expert Peregrine Storrs-Fox explains the wisdom of the regulation, highlights that all consignors of dangerous goods across road, rail and inland waterways must have a DGSA appointed as of 1st January this year but also asks if this is enough to ensure safety.

The European Agreement Concerning the International Carriage of Dangerous Goods by Road (ADR), the Regulations Concerning the International Carriage of Dangerous Goods by Rail (RID) and/or the European Agreement Concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) all include a requirement to appoint a DGSA.

However, there is no such requirement under the International Maritime Dangerous Goods (IMDG) Code for maritime transport, or for the International Air Transport Association (IATA) regulations for goods transported by air. Regardless, it would be prudent for the DGSA to be aware of the applicable requirements under maritime and air modes, and how they interact with road, rail and inland waterway modes.

“TT Club risk management expert Peregrine Storrs-Fox explains the wisdom of the regulation, highlights that all consignors of dangerous goods across road, rail and inland waterways must have a DGSA appointed as of 1st January this year but also asks if this is enough to ensure safety.”



A DGSA is responsible for assisting businesses to prevent the risks associated with the carriage of classified dangerous goods, in particular the risks posed to people, property and the environment. The responsibilities of the role include monitoring compliance with the regulations governing the carriage of dangerous goods and extend to the provision of training, reporting of incidents to the applicable authorities and investigating accidents or breaches of the regulations. The appointed DGSA must also prepare an annual report outlining the performance of the business as transporters of dangerous goods. The full requirements for the role are set out in Chapter 1.8.3 of ADR.

Any entity involved in consigning, packing or transporting dangerous goods by road, rail or inland waterway is required to appoint a DGSA. However, it is possible for Competent Authorities (responsible national agencies) to establish certain exemptions.

The exemptions are generally influenced by the activities of the business (particularly national transport), the nature of operation, whether radioactive material is transported, application of Special Provisions and the quantity of goods to be transported.

In light of the above, it would be prudent for businesses to assess the need to appoint a DGSA against their specific operation and where applicable the relevant exemptions.

In 2019, the ADR introduced changes to the regulations, stating that those entities defined as ‘consignors’ only were required to appoint a DGSA. ‘Consignor’ is defined in ADR as “the enterprise which consigns dangerous goods either on its behalf or for a third party. If the transport operation is carried out under a contract for carriage, consignor means the consignor according to the contract for carriage”.

The change came into effect on 31 December 2019, and stated that the necessary appointment must happen no later than 31 December 2022. From 1 January 2023 all consignors of dangerous goods across road, rail and inland waterways must appoint a DGSA.

The business must decide whether to train and appoint one of its employees as DGSA or alternatively contract with a third-party provider to act on their behalf. However, it is vital to ensure that the appointed DGSA has sufficient time and resource to undertake this important role of managing the risks associated with the transportation of dangerous goods. Complex businesses that operate from multiple locations might consider the appointment of more than one DGSA.

A DGSA must pass written examinations to earn a certificate that specifies the applicable modes of transport as well as the classes of dangerous goods on which the individual is qualified to advise. The certificate expires after five years and the DGSA must then sit a further examination to maintain their qualification.



The first task of any DGSA should be to undertake a thorough assessment of the entity’s activities associated with the shipment of dangerous goods. While not exhaustive, this should include the identification of the classes of dangerous goods to be shipped, whether they qualify for limited quantity or excepted quantity or any other exemptions, details of the types of packages being transported, identification of individuals’ roles and responsibilities, training requirements, and the existence and adequacy of any written procedures.

Part of the DGSA role is to ensure that they (and the business) are up to date with legislative and regulatory amendments, guidelines and industry good practice concerning the carriage and handling of dangerous goods.

The relevant texts are typically amended on a biennial cycle and the DGSA must identify and evaluate any required changes to existing procedures and communicate them to all relevant personnel.

The requirement for consignors to appoint a DGSA could have positive impact on safety. A greater depth of knowledge through the supply chain would be beneficial and additional responsibility on those businesses entering goods into the supply chain should be widely welcomed. Consignors would also benefit from efficiencies in identifying potential issues before they would otherwise arise in relation to packaging, segregation or packing. Early and successful interventions are likely to minimise delays and associated costs.

However, as noted above, this compliance role does not apply in the maritime or air modes, which might assist broader intermodal safety objectives. Furthermore, ensuring awareness of and compliance with dangerous goods regulations within the varied supply chain entities does not in itself ensure all is done correctly. For example, complete and accurate classification (by a consignor) may well require a scientist.

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CLP: EC PROPOSES MAJOR OVERHAUL OF CHEMICAL LABELLING INCLUDING MINIMUM FONT SIZES

Author: Tracey Hemingway-Wright, Marketing Manager, Hibiscus Plc

EC UNVEILS PROPOSAL TO REVISE EU CHEMICAL LABELLING RULES

On 19th December 2022, the European Commission proposed a revised Regulation on the classification, labelling and packaging of chemicals (CLP) and introduced five new hazard classes for endocrine disruptors and other harmful substances.

The addition of these new hazard classes means that relevant chemical manufacturers will need to update the labels on their packaging, Safety Data Sheets, and REACH registration dossiers when selling chemicals on the EU market.

However, it is the proposed changes to label formatting that could have far wider implications for the rest of the chemical industry. These proposed amendments, aimed at improving the communication of chemical hazards, include significant changes such as minimal font sizes and changes to the layout of labels.

“On 19th December 2022, the European Commission proposed a revised Regulation on the classification, labelling and packaging of chemicals (CLP) and introduced five new hazard classes for endocrine disruptors and other harmful substances.”

NEW LABELLING PROPOSALS

In order to improve the hazard communication of chemicals the EC suggested 5 measures:

1. **Obligatory formatting rules** for labels
2. A framework of rules for **selling chemicals in refillable containers**
3. Voluntary partial **digital labelling**
4. A broader use of **fold-out labels**
5. Additional **derogations for chemicals sold to consumers in bulk** (such as fuel) **and in very small packaging** (such as writing instruments)

OBLIGATORY FORMATTING RULES FOR LABELS

The new formatting rules aim to increase the visibility and legibility of important information on chemical labels. One key aspect of this proposal is the introduction of minimum font sizes for labelling text.

It is also proposed that the text on the label shall have the following characteristics:

- (a) the background of the label shall be white;
- (b) the distance between two lines shall be equal, or above, 120 % of the font size;
- (c) a single font shall be used that is easily legible and without serifs;
- (d) the letter spacing shall be appropriate for the selected font to be comfortably legible.

The following table from the proposal indicates the minimum dimensions of the label, the pictogram, and the font size of letters:

Table 1.3
Minimum dimensions of labels, pictograms and font size

Capacity of the package	Dimensions of the label (in millimetres) for the information required by Article 17	Dimensions of each pictogram (in millimetres)	Minimum font-size
Not exceeding 3 litres:	If possible, at least 52x74	Not smaller than 10x10 If possible, at least 16x16	8pt
Greater than 3 litres but not exceeding 50 litres:	At least 74x105	At least 23x23	12pt
Greater than 50 litres but not exceeding 500 litres:	At least 105x148	At least 32x32	16pt
Greater than 500 litres:	At least 148x210	At least 46x46	20pt’;

The following label example shows the text at the proposed size for a 5L container (74x105mm).

The necessary elements, with the text at 12pt, take up the full size of the label with no room left for contact details or other information. If a substance, or mixture, requires more than 2 hazard pictograms, or a larger amount of phrases, this would be impossible to configure and a larger label would be required – having a knock-on effect on the amount of material needed for the label, and also the cost and subsequent waste thereafter. This could also lead to companies aiming to minimise the number of phrases per label, resulting in the end user having less information at hand.

5 Litres



FERRIC SULPHATE 35%
 Contains: Diiron tris(sulphate)

May be corrosive to metals.
 Harmful if swallowed.
 Causes skin irritation.
 Causes serious eye damage.
 Do not eat, drink or smoke when using this product.
 Wear protective gloves/ eye protection/ face protection.
IF SWALLOWED: Call a POISON CENTER/doctor if you feel unwell.
IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing.
IF ON SKIN: Wash with plenty of water. If skin irritation occurs: Get medical advice/ attention.

Danger

SELLING CHEMICALS IN REFILLABLE CONTAINERS

A framework of specific rules has been proposed that will ensure that hazardous chemicals sold in refillable containers does not lead to any increased risks. This method of sale will be limited to chemicals with less severe hazards.

VOLUNTARY PARTLY DIGITISED LABELLING

It is proposed that a limited set of information could be provided by digital means only as a complementary hazard communication measure. Only label elements that are not instrumental in the protection of health and safety and the environment, and are not obligatory under the GHS regulations, may be replaced by a digital label.

In addition to keeping essential safety information on the physical labels, making more use of digitalised labels would make it possible to provide additional information online about hazards, safety, and product composition, in many various languages.



BROADER USE OF FOLD-OUT LABELS

The proposal amending CLP advocates for the broader use of fold-out labels as they allow the industry to take advantage of 'economies of scale', in particular when distributing a chemical featuring multiple languages which makes labels hard to read at the expense of communicating important hazard and safety information. Current legislation only allows for the use of fold-out labels if the general rules for the application of labels cannot be met due to the size, or shape of the package, but proposals are advising that more flexibility be given to suppliers by providing a broader use of the fold-out label.

LABELLING OF ONLINE SALES

In order to address legal gaps and high levels of non-compliance the new proposal aims to strengthen the rules for online sales.

Online marketplaces are not defined as 'importers' nor 'economic operators' and therefore EU Member State authorities cannot enforce EU chemicals safety laws for goods sold online, especially if online marketplaces are registered outside of the EU.

It is proposed that the same classification, labelling and packaging obligations should apply to online sales and that chemicals sold online, in the EU market, must be in compliance with the CLP regulations.

In addition, there will be an obligation on the advertising of hazardous substances and mixtures to contain all of the information which is most important in terms of safety and protection of the environment, and for the advertisement to contain the hazard pictogram, signal word, the hazard class, and the hazard statements.

DEADLINES FOR UPDATING INFORMATION ON LABELS

As well as changes to the labelling elements, the Commission also published proposals regarding fixed time periods for updating labels.

To increase enforceability of the obligation placed on suppliers to update their labels after a change in the classification and labelling of their substance or mixture, a deadline is to be set with a clearly defined start date.

In the case of a change which results in the addition of a new hazard class, or a more severe classification, or new supplemental labelling elements, the supplier shall ensure the label is updated within 6 months after the results of a new evaluation were obtained.

In the case of a classification updated to a less severe hazard class, without triggering classification in an additional hazard class, or new supplemental labelling requirements, the deadline for updating the labels shall remain at 18 months from the day on which the results of a new evaluation were obtained.

NEXT STEPS

These changes would only apply to chemicals sold in the EU market and it is unknown, as yet, if this will be implemented into GB CLP regulations.

It is also worth noting that these proposals are not yet **final**, and the EU is taking feedback from the industry and stakeholders before finalising any regulations. The implementation of these proposed measures will have an impact on the cost of production of chemicals and the industry will have to come up with solutions to balance safety and economic aspects.

Read the Delegated Act and Proposal for Revision of the Regulation on Classification, Labelling & Packaging of Chemicals.

A consultation on the proposal for revision is open until the 9th March 2023 and comments can be made [HERE](#) (scroll down to the open consultation).

Do NOT make any amendments to your labels on the basis of these proposals. It is possible that further alterations may be implemented before the actual publication of any legal text.

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DANGEROUS GOODS THROUGH THE CHANNEL TUNNEL

Author: Sarah Collyer, DG Policy Specialist, Euro-Tunnel

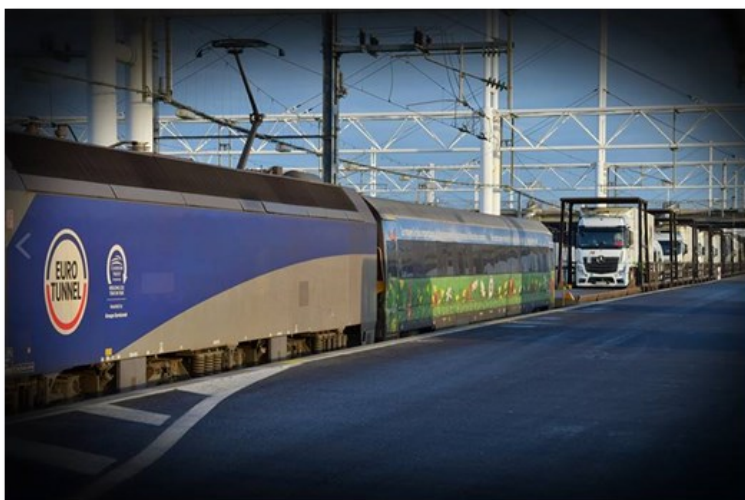
Did you know that you can transport dangerous goods through the Channel Tunnel? No? **Well**, you can – read on to find out more.

Since its opening in 1994, the Channel Tunnel has been designed to be one of the safest modes of transport known to date. What most people don't know is that Eurotunnel holds the Concession to operate the Channel Tunnel, but it is overseen by a governing body called the IGC (Intergovernmental Commission), who give agreement (but very often don't!) to anything safety related. The IGC is made up of representatives from both the UK and French Governments, mainly from departments involved with transport and safety. Discussions around the transport of dangerous goods began as early as 1988, some 6 years before the Tunnel officially opened, both with industry and with the IGC. A final list of UN numbers was agreed in 1995 and the first DG consignments were accepted later that same year.

There is a specific policy for the transport of DG through the Channel Tunnel, which is based principally on RID (it is a railway system after all) but also on ADR carried “piggyback” on freight shuttles. The same DG information is used for UN numbers, Proper Shipping Names, Packing Groups, etc., which makes things much easier for checking DG transport documents. It wasn't so easy in the early days. I'm sure there are those among us who remember the pre 2001 ADR and RID Item Numbers - just the thought of them brings back bad memories of trying to explain to truck drivers about the difference between 10b1 and 10b2 levels of flammability for aerosols!

As previously mentioned, there is an agreed list of dangerous goods that can be transported so unfortunately, not everything included in either ADR or RID can be accepted. There are restrictions in place that just don't exist anywhere else but on the other hand, there are many UN numbers that can be transported without any restrictions at all. These include many gases such as refrigerated liquid carbon dioxide (currently being used extensively in the food and drink industry) and helium (currently being used to cool MRI scanners),

“Discussions around the transport of dangerous goods began as early as 1988, some 6 years before the Tunnel officially opened, both with industry and with the IGC.”



environmentally hazardous products, life-saving appliances, safety devices for motor vehicles, certain radioactive products for cancer treatments.

Even most types of corrosive batteries can be transported, including those being sent for recycling as long as they are packaged under SP 598.

Empty, uncleaned packages can be accepted as long as the original product would have been accepted and any restrictions applied. Anything that is listed in ADR/RID with the term 'NOT SUBJECT TO ADR/RID' can be accepted without restrictions on the quantity carried, including DG transported under Special Provisions that make it so.

Contrary to popular belief, DG being transported under the Limited and Excepted Quantity exemptions can all be accepted, usually without the need for declaration or a transport document. However, it should be noted that whilst it isn't necessary, if a declaration is made by the driver during check-in, then a transport document will be required. This is mainly because the act of making a DG declaration when it isn't required suggest that the driver's DG knowledge may not be as good as it should be!

One very big exception and something that has to be refused on many occasions, is lithium batteries. They can be transported but have a weight restriction in place for both the unit package and the vehicle. Given the current shift to alternatively fuelled vehicles is frustrating but there's a project in place looking into how these limits could be increased, whilst keeping the Channel Tunnel and its occupants safe.

So next time you're considering the transport of dangerous goods, think about whether it could go via the Channel Tunnel. You'll probably find that it can!

Looking forward to seeing you at the AGM in March.

Sarah Collyer, DG Policy Specialist, Eurotunnel
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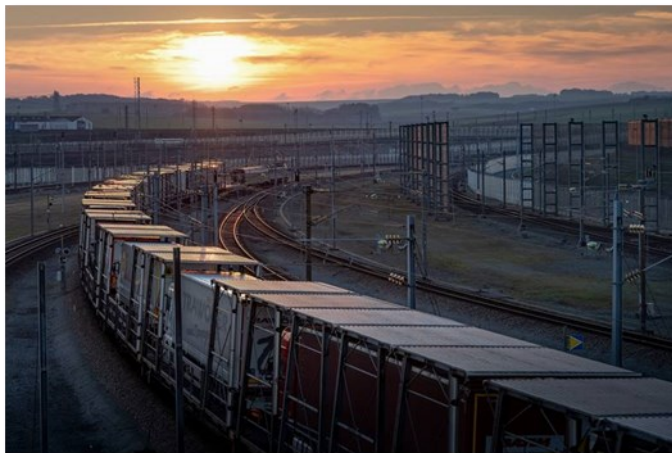
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LQ PACKAGING - IS, 'DON'T SWEAT THE SMALL STUFF' BAD ADVICE?

Author: Kevin Dougherty, BADGP Committee Member and Director of Operations, Air Sea Containers Ltd

Small amounts of dangerous goods can be transported as Limited Quantities in packaging that has not been UN approved. Whilst this has a number of advantages the facts on what packaging can be used and how it should be used can be overlooked.

UN approved packaging has very specific requirements for testing, approval, manufacturing consistency, conditions of use and preparation of the packaging. Whereas Limited quantity packaging is less restrictive, but it does still have to meet certain criteria which can vary depending upon the mode of transport used. Based on the classification of the product when transporting limited quantities, the risk is generally considered to be less, so is 'Don't sweat the small stuff' bad advice?

Packaging Requirements

Limited quantity packaging must consist of inner packaging packed inside suitable outer packaging with the most common type being a 4G Fibreboard box. However, the packaging requirements differ based on the mode of transport and albeit the construction requirements are consistent the method to assess capability is not.

Road and Sea

Limited Quantities are not subject to the full transport regulations except for relevant provisions where applicable and in respect of packaging the following will apply:

3.4.1 (d) Part 4, General provisions for the packing of dangerous goods in packagings, including IBC's and large packagings, paragraphs 4.1.1.1, 4.1.1.2, 4.1.1.4 to 4.1.1.8.

Of particular note, 4.1.1.1 states that dangerous goods shall be packed in good quality packaging, strong enough to withstand normal transport conditions, closed in accordance with information provided by the manufacturer, the provisions apply to new and reused packaging.

3.4.1 (f) Part 6, Construction requirements of 6.1.4, for fibreboard boxes 6.1.4.12.

6.1.4.12.1 refers to the need for strong and good quality double faced corrugated fibreboard (single or multiwall) and should be appropriate to the capacity of the box and its use.

There is also a need to conduct a water resistance test by the Cobb method which measures water absorption to determine it is not greater than 155 g/m².

“UN approved packaging has very specific requirements for testing, approval, manufacturing consistency, conditions of use and preparation of the packaging. Whereas Limited quantity packaging is less restrictive, but it does still have to meet certain criteria which can vary depending upon the mode of transport used .”

The box should have proper bending qualities and slotted to permit easy assembly without cracking, surface breaks or undue bending and the corrugated fibreboard shall be firmly glued to the facings.

6.1.4.12.3 refers to the specification of the joins of the box which shall be taped, lapped and glued or lapped and glued with metal staples, for example, a FEFCO (0426) Pizza box style would not be acceptable unless all the joins were taped.

Air

Air mode follows the same principles as Road and Sea but goes further with the need to conduct packaging performance tests.

The capability of the packaging must be tested as prepared for transport and able to withstand a 1.2m drop test onto a rigid, non-resilient, flat, horizontal surface, in a position most likely to cause the most damage. The outer package must not show any damage likely to affect safety during transport and must not have any leakage from the inner packaging.

In addition, a stack test must be performed to determine the package is capable of withstanding a force applied to the top surface for a duration of 24 hours, equivalent to the weight of identical packages if stacked to a height of 3m including the test sample.

Packaging that has already been used must be inspected and be in such condition that they will protect their contents and perform containment functions as efficiently as new packaging.



Packaging Review

In simple terms we should determine the mode of transport and align the necessary packaging to meet the relevant regulations.

You should establish if the packaging to be used is suitable based on the construction criteria and if transporting by air the specific performance tests have been met.

However, dangerous goods packed in Limited quantities do not require an entity to appoint a DGSA, moreover, when transporting by air which has additional criteria on packaging performance, a DGSA is not required at all, so who should conduct the review?

For this we have to assume that the entities transporting dangerous goods have all received the required training and appointed individuals to ensure that the relevant obligations have been met.

Training

Training is essential and a requirement based on the amount and scope of the entities involvement in the transport of dangerous goods.

Whilst there are many excellent training courses for individuals transporting dangerous goods it is common to see entities failing on their understanding of packaging.

This can be apparent even when full UN approved packaging which has met construction requirements as part of the detailed test regime and when manufacturers assembly instructions have been provided.

Albeit the risk is considered less when transporting Limited Quantities, the packaging used does not have to be part of a UN approval scheme and is therefore uncontrolled with end users needing to understand the relevant packaging provisions that apply.

Without a DGSA supporting an entity you should, following relevant training, review packaging needs and assess and record the construction and capability of the packaging along with any assembly instructions to ensure a consistent approach is undertaken.

As members of BADGP an updated DGSA annual report along with guidance has been uploaded to the website and is available to download from the members area. This is an extremely useful document that includes a specific section on Packaging and could be incorporated into good management practice even if a DGSA is not required.



[Home](#) > [Members](#) > [Members' Downloads](#) > [Useful Documents](#)

Useful Documents For BADGP Members

-
- **Dangerous Goods Safety Adviser (DGSA) Annual Report Template (V2 - published January 2023)**

- [Download as a PDF](#)

- [Download as a word document](#)

BADGP have prepared a document to assist those who have to provide a Dangerous Goods Safety Adviser (DGSA) Annual Report.

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- **A BADGP Guide: Dangerous Goods Safety Adviser (DGSA) Annual Report Template Guidance Document (published January 2023)**

- [Download as a PDF](#)

A brief guide to accompany the BADGP DGSA Annual Report Template revision.

Conclusion

Transporting limited quantities may present less risk and as such there are advantages to the shipper but packaging still has to meet relevant provisions. Whilst drop and stack tests are only a requirement under Air regulations, it would be considered good practice to carry these out also when transporting by road and sea to evaluate performance capability.

When using Limited quantity packaging you should always consider:

Construction

Check the construction requirements of the packaging have been met.

Capability

Assess the capability of the packaging performance provided by the manufacturer.

Consistency

Ensure that controls are in place to document and monitor all materials used including assembly methods and the capability of the packaging.

So, is 'Don't sweat the small stuff' bad advice?

If you don't have a plan on how to ensure your packaging meets requirements, then the answer is yes. However, you may conclude that by incorporating good management practices the answer is no.

Limited quantities are still dangerous goods and as such, common sense, proportionality and judgement should be based on the feedback of professional expertise.

If you would like advice on LQ packaging you can contact us on UK@airseadg.com

Kevin Dougherty, Director of Operations Worldwide, Air Sea Containers

<http://www.airseadg.com>

<https://www.linkedin.com/company/air-sea-containers-ltd>

<https://twitter.com/AirseasPackaging>

<https://www.youtube.com/channel/UCmTIDfjkMJOqDCyJWjyR3Kw>

PAST EXPERIENCES WITH DANGEROUS GOODS

Author: Rob Summers, BADGP Member

I always read with interest the articles in the newsletters. The knowledge of the experts and the sharing of information surrounding dangerous goods that makes for the safer handling, storage and transport of dangerous goods.

This made me think about the time when there was little training, non-existent H&S and hardly any enforcement.

I share just a few of my encounters with DGs which I hope some will find interesting.

My Grandfather built one of the first roadside filling stations on the A5 after returning from WW1, a service area that is still in operation today. Later, about 100 years ago, he bought a 300-year-old ex-nunnery and converted the outbuildings into a fuel storage site where he ran a successful business delivering fuels to the rural farms and villages around Rugby. It should be noted that many isolated farms had no electricity at this time.

He set out each morning with an old flatbed truck with a couple of square tanks held in place by gravity and a load of jerry cans filled with various flammable liquids for delivery to rural farms and villages.

Fuel for the tractors, Esso blue paraffin and Esso pink paraffin, methylated spirit and various cans of oil. The paraffin was for the oil lamps and Aladdin stoves and heaters.

To supplement this, he kept dozens of chickens and had acres of potatoes. So, on board his lorry apart from the fuels he sold Eggs, Potatoes, Honey from his many hives plus oil lamp spares including wicks and chimneys.

So, from the age of about 5 I used to help/hinder him by getting round his feet while he was getting up the orders for the next day.

“.....this made me think about the time when there was little training, non-existent H&S and hardly any enforcement. I share just a few of my encounters with DGs which I hope some will find interesting.”



Imagine the scene around the various storage tanks, spills on the floor chickens underfoot and in season turkeys also, me climbing into empty uncleaned tanks and when old enough would sometimes travel with him in the lorry.

One of the outbuildings had a bunded tank for petrol but no ventilation so when opening the door, one was met by a strong smell of petrol. The atmosphere within the shed was obviously not in the flammable range as my younger brother even tried to light a fire in the shed one

day. There was also a tool sharpening wheel outside the shed and when using it the sparks from the grinder went into the shed if the door was open.

Two other facts about Grandad. In his storeroom were cycle acetylene lamps and the calcium carbide on the shelf next to them. And he always kept a loaded 12 bore behind the office door. I never touched it for fear of the punishment, but I did disassemble some cartridges and was very disappointed with the outcome when I threw some of the powder on the fire.

That was the 1950s but the 1960s had its own hazards. I left grammar school and went to work at Peterborough power station as a lagger's mate. I had to mix up asbestos plaster to cover a new ducting system. Mixing the plaster indoors in a paddle mixer with the plaster dust settling everywhere. No PPE whatsoever. To make matters worse where the new duct was fitted to the older ducting some of the old asbestos had to be stripped off so more asbestos dust in the air. As a 16-year-old I had to supply the plaster to the lagger, and this involved working at heights up to 30 metres added to that the ducts were so hot that if you touched them, you could get serious burns. No training, no PPE or fall arrest equipment.

Moving on, as lads we had an old Ford van that you could access the engine from the cab. If we ever ran out of petrol, then we would stick a pipe from a propane cylinder into the top of the carburettor. Strangely enough 10 years later I became a qualified and approved installer of twin fuel systems in cars and vans.

Then later in the sixties I was on an earthmoving contract on the largest construction site in East Anglia. One day one of the machines uncovered a WW2 incendiary bomb. After the site was closed for two days while Bomb disposal dealt with it, we were told that if we found any more, we were to bury them again in the ornamental mounds surrounding the site. The site had formerly been a WW2 airfield but don't worry the site has since been demolished and totally cleared.

On another occasion I had to dig a 2km trench for a water main through rock. We employed a local blaster from a nearby quarry to blast the rock. I worked with him by drilling the holes then setting the charges. He then set the detonators and set them off. We set 10 at a time and had to count the blasts. With about a 20% failure, it was then my job to locate the unexploded charges.

The 'explosives expert' didn't instil much confidence as he had fingers missing from both hands.

Later on, I worked on ready mixed concrete trucks where on a Saturday we would be paid five hours to clean the trucks. To aid us in this chore we used Hydrochloric acid that had to be dispensed from large glass carboys. We were supposed to dilute the acid with water, but neat acid worked better at removing the lime stains from the trucks.

Apart from some PVC gloves there was no PPE supplied for handling the acid. I soon found out that a nylon bristled broom didn't last very long and my nylon shirts soon were full of holes. I was soon made a manager and daily I used Calcium Carbide to measure the moisture content of sand.

Still in the 60s I went to work for a company that restored old mobile cranes, without any training or PPE I soon taught myself to use the Oxy-acetylene kit for cutting brazing and welding. There was even an old acetylene manufacturing plant in one corner of the workshop, Heating in the workshop came from a single Salamander waste oil burner that was fuelled by any flammable liquid. Next to this we sprayed the vehicles with cellulose-based paints but we never had a fire.

After a quiet start to the 70s I took my HGV class 1 in 1974 and then one of my first jobs was to transport frozen food in an insulated trailer, no reefer just blocks of dry ice placed in the trailer and left for 30 minutes. I often wondered why I felt lightheaded and nauseas after spending some time in the load area.

I used to take the tractor unit home with me and park it outside my house. Imagine my surprise to wake up one morning to find an ISO tank on a skelly dropped next to my unit with a note on it to deliver it and return it to the docks. It was full of Sulphuric acid.

Apparently, the regular driver had scared himself on the first roundabout he came to and thought I should pull it. That was an interesting journey with no training, PPE or vehicle kit.

Just a month later I was told that I had to haul a load to Zahedan in Southern Iran, another interesting journey crossing one of the hottest places in the world, the Bam desert, driving in altitudes over 3000 metres and driving through rebel held territory. When we broke the seals on the tilt trailer, we found that the load had included flammable liquids that had survived the rigours of the journey, I hate to think what the temperature was in that tilt.

Over the next few years, I managed the use of hardeners and accelerators in the GRP industry and flammable liquids including toxic corrosive primers for which we had to use specialist breathing equipment and extraction equipment, so things were getting better.

Then in the early 80s it was off to one of the oil rich African countries for nearly 3 years. Now that was an eye opener. Burnt out tankers on roundabouts and in ditches on bends. Very often when approaching a tanker coming the other way the tank wheels were running up to a metre out of line with the unit meaning that the tank wheels were on your side of the road.

Once when picking up gas bottles for the compound and waiting in the queue to be loaded a trailer full of gas bottles was being delivered. The large propane cylinders were stacked on their sides several high across the trailer with a couple of wooden chocks holding them in place.

The driver knocked out the chocks and let the cylinders roll off the trailer into a heap. Many of the cylinders did not have collars to protect the valves and I made a hasty retreat.

In the mid-80s I worked for an international pharmaceutical company. A regular job was to pick up chemicals as a return load. As I was to display tremcards I asked if I should be hazardous trained only to be told the load was LQ as the drums were only 125kgs. There were normally 12 tonnes on board.

One day I was told to take 40 pallets of paediatric prescription cough medicine to the local council land-fill tip. The medicine had turned to alcohol during the manufacturing process and had to be destroyed. As I tipped the load the compactor smashed up all the glass bottles. I imagine that there were some very happy worms and rats that night. This was before the change in the waste regs.

I then went into to training and ended up as a Training and compliance manager, ADR instructor and company DGSA and finally an External Verifier for the Dangerous Goods Driver Training Scheme.

So with the help of organisations like BADGP the world is a safer place as the transport of dangerous goods is more regulated and enforced.

Rob Summers
BADGP Member

DGSA TRAINING STANDARDS FOR CLASS 7

Author: Geoff Frackelton, Principal Inspector – Head of GB Transport Competent Authority

In 2021 the Office for Nuclear Regulation (ONR) raised concerns, with BADGP, over the standard of DGSA training and competence for those DGSAs advising on Class 7 dangerous goods. Following this challenge, DfT's Training Advisory Panel (TAP) reviewed the current DGSA training standards for Class 7. BADGP and other industry representatives provided an input into these discussions. TAP has now delivered its recommendations and the outcome may be summarised as follows:

DGSAs should be suitably trained and hold the road/rail all classes qualification.

For DGSA that advise duty holders on class 7 dangerous goods, the additional class 7 training course, based on the syllabi provided by the Radioactive Materials Transport Users Committee (RAMTUC), is recognised by ONR as Relevant Good Practice (RGP). The syllabi developed for this course programme are designed to meet legal training duties laid on the industry and to provide appropriate operational and management skills to those with duties affected by the transport regulations.

DGSAs should also be able to demonstrate that they have the necessary knowledge and experience to make them suitable to appropriately advise duty holders.

“In 2021 the Office for Nuclear Regulation (ONR) raised concerns, with BADGP, over the standard of DGSA training and competence for those DGSAs advising on Class 7 dangerous goods.”



Geoff Frackelton, Principal Inspector – Head of GB Transport Competent Authority
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NDGTC AGM 2023 WITH A SECURITY TWIST

Author: Mark Hunsley, BADGP Committee Member and of DGSATech Ltd

I was invited to attend the National Dangerous Goods Training Consortium (NDGTC) AGM, as I work in conjunction with the administration team assisting in the management of their IT systems, so I took the opportunity to set up a small stand promoting the benefits of BADGP to their members.

Not everyone will be aware of NDGTC, briefly they are a consortium of ADR training providers which has existed, in some form, for many years. They provide their roughly 80 members with an approved set of training material for delivering ADR training, including Power-Point presentations, films, practical exercises, hand-books, scenarios and more.



“Not everyone will be aware of NDGTC, briefly they are a consortium of ADR training providers which has existed, in some form, for many years. They provide their roughly 80 members with an approved set of training material for delivering ADR training...”

NDGTC are a non-profit organisation and attempt to spend all their income to develop and improve the training resources. This last year has seen them expand their portfolio by adding Driver CPC accreditation to their ADR materials and this is a development path they will be following in the coming year with additional courses for driver CPC.

The AGM follows a very similar pattern to that of BADGP, a morning session where the official business is transacted, I can't say much on this, as with most organisations, this is confidential, suffice it to say the members raised very few, if any, objections to the way the consortium is being managed and is heading.

The later morning session has a number of invited guest speakers, this year these included:

David Pope – DfT who gave an informative presentation of the changes in ADR / RID 2023 and also discussed and presented the video produced by the DfT regarding the changes for Consignors appointing a DGSA under ADR 1.6.1.44

David was followed by Angus Preville and Sean Keown - from the DfT Transport and Security Compliance team, they gave a very interesting presentation on Security inspections, detailing how their team performs the inspections under the requirements of ADR 1.10.

They stressed that transport security is not something to be treated casually and provided a number of useful links to resources that may assist companies in compliance with the security requirements:

Firstly the Cross-sector Safety and Security Communications (CSSC), www.thecssc.com, CSSC aims to help businesses remain safe and secure by providing information that will assist them to develop robust resilience and emergency preparedness plans. The key success of the project has been in establishing a partnership between business, the Police and the Government, using the Cross-sector Safety and Security Communications (CSSC) initiative. The web site offers lots of advice and resources and is well worth a browse. It's also possible to register a business to receive security alerts, this was recommended for all companies.

Secondly Protect UK, www.protectuk.police.uk or the Protect UK App available from your mobile devices App store. This provides information on the current threat level along with lots of guidance articles, again well worth reviewing. It also includes Action Counters Terrorism (ACT) Awareness E-Learning covering the best practices to help counter terrorism and increase your security awareness, again a useful tool for anyone with an interest in security or involved with dangerous goods transportation.

Finally, the SQA ADR team, who manage the ADR examinations and system, gave an update on recent changes within SQA. There have been a number of personnel changes and their main focus has been developing the question bank for the ADR exams, so future candidates may see some new or revised questions at future exam sessions.

There were two trade stands, BADGP represented by myself and Labeline offering their range of products with our old friend Mr Richard Shreeve.

All in all, an enjoyable day for me meeting a number of interesting people who work hard to promote good knowledge of dangerous goods transport.

Mark Hunsley, BADGP Committee member and of DGSATech Ltd
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DANGEROUS GOODS AWARENESS TRAINING SESSION PLAN

Author: Dan Lee, BADGP Committee member and of Dan Lee Training Limited

Dan Lee BADGP Committee member shares some of his training knowledge to assist DGSAs with meeting the DG General Awareness training requirement of ADR 1.3.2.1. Dan runs his own training company, Dan Lee Training Ltd and has written a book on Trainer methodology entitled the Trainer Toolkit from which his illustrations and examples are provided within this article. Feedback can be provided to him at danleetraining@icloud.com

“Dan Lee BADGP Committee member shares some of his training knowledge to assist DGSAs with meeting the DG General Awareness training requirement of ADR 1.3.2.1.”

A recent enquiry made by a member of the BADGP committee concerned the provision of a document template relating to the member guidance documents referring to conducting DG Awareness training on the member documents download section on our website. From what I understood of the enquiry the member was looking for more than a text guide on what constitutes DG awareness training – in fact they were looking for a DG Awareness session plan, scheme of work or as we academics used to call them – lesson plans.

If you have undertaken the various professional trainer certification processes – in the past they were known as City and Guilds, PTLLS and now the AET you’ll know that a session plan or scheme of work is pretty useless without the application of a session aim and its associated objectives.

A session plan / scheme of work template should look something like this:

Manual Handling Train the Trainer



Scheme of Work

Trainer	Dan Lee	Class/Group		Dept.		Training Location	
Course				Subject		Module Unit(s)	Day 1
Award Body							

Aim of Session:

Specific Objectives

By the end of this session the delegate will be able to:

Time	Topic / Content	Learning Outcome / objective	Training and learning activities	Method of assessment	Resources to be used
	Introduction	Familiarisation with the trainer and fellow delegates	Setting a safe learning environment	Course feedback and evaluation process	



Before we start filling the empty fields, we should consider the following:

- Who we are training
- What will the session's aim and objectives be

Our audience

We should always try to train people who have a shared need for specific knowledge and skills that will form the basis of the session's structure and learning outcomes. If we are writing a session plan for office-based staff then the content will be markedly different from warehouse staff, packers, drivers etc.

The audience and their required learning will dictate the length of the training session also. Office staff may only require 2 hours of training, warehouse staff 3 hours, drivers 4 hours and packers 5 hours with a practical session of doing physical packing.

Once we know who we are going to train we should then establish the session's aim and objectives. The aim is the overall outcome of the session – what do you plan for your attendees to have learned as a result of attending the session or in our case – what specific requirement is to be met. We could call the aim our intended target – in the case of DG Awareness training this is easy to state:

To achieve compliance to the requirement stated at ADR 1.3.2.1 for delegates to be familiar with the general requirements of the provisions for the carriage of dangerous goods.

The aim is therefore, clear and easily measured. If we imagine our course attendees stood on one side of a riverbank and there is a need for them to get to the other side of the river (the aim) without using a boat or a bridge then we could provide stepping stones across the river's width which they take in turn to reach the opposite side. These stepping-stones would be known as the session's objectives.

Objectives must be measurable. You need to be able to measure and confirm that the session's attendees have received the knowledge, skills and information and can use it in the required manner.

All too often instructors, tutors and trainers use the term 'understand' as a measurable term. The term understand cannot be properly measured – it's a movable feast and will have different interpretation in different students. The table below provides a list of measurable terms to use and a list of terms not to use within your objectives.



Acceptable – Measurable	Vague and un-measurable
State	Know
Describe	Understand
Explain	Really know
List	Fully understand
Evaluate	Be familiar with
Identify	become acquainted
Distinguish between	Have a grasp of
Analyse	Obtain a working knowledge
Outline	Acquire a feeling for
Summarise	Appreciate
Draw a diagram of	Realise the significance
Compare	Be aware of
Recognise	Have information about
Apply	Believe
Order	Be interested it
Suggest	
Give examples of	
Recall	
Assess	

(Adapted from Preparing Materials for Open, Distance Learning by Derek Rowntree, published by Kogan Page.)

For the sake of example let's provide a set of objectives that can be used for a session on DG Awareness for office staff to meet the requirements of ADR. When we examine ADR 1.3.2.1 there is a not a lot of specific information to follow. This is not the case when we examine the same requirement for the IMDG and IATA DG codes and perhaps we should be influenced by their content and maybe even borrow some of them?

The aim of the session could be:

To provide an overview of the legal and transport codes requirements when involved in the processes of sending, transporting or receiving dangerous goods items so that the company can meet the requirement to prove that all relevant staff have received the required general awareness training as required by ADR 1.3.2.1

A set of basic learning objectives for this session to office-based employees who occasionally get involved with DG matters would be:

- List the types of goods that could be classified as dangerous goods within their homes
- Provide three examples of dangerous goods shipments that their company regularly engages with
- State the number of dangerous goods classes
- Identify the dangerous goods codes and the mode of transport that they refer to
- Describe the responsibilities of the company in their role as either consignor, carrier or consignee – state at least two responsibilities
- Be able to distinguish between the types of marks and labels used to identify GHS/CLP chemicals and Dangerous Goods transport labels
- Recall the five elements of a Proper Shipping Name as it would appear in a transport document or e-mail communication relating to a shipment
- Identify the company's DGSA and explain how he/she can be contacted

- Summarise the company's procedure for dealing with DG enquiries and list the essential information that is required to ensure that such enquiries can be properly and promptly dealt with.

It always helps if we preface this list of objectives with the statement, 'By the end of the session the learner will be able to:

Once we have established the aim and objectives for the session, we can start to populate the session plan. Each objective will be met with specific input in either slides, pictures, exercises, discussions, reference to a manual or any other method that you feel is valid in order to achieve the stated objective.

In Part 2 of this article, I will provide some tried and trusted methods of achieving these objectives that I have established over the last 20 years of delivering such training to various clients.

If you have read this far you are either enthused by the prospect of learning more about the art of session plan writing or you think this is just academic hogwash that has no relevance. To those of you who are inclined to think the latter can I just end with this thought?

The requirement to provide dangerous goods training is a legal one. In an incident where someone is injured or worse – either an investigation by the authorities is made or worse still a claim is made by the injured party or next of kin's legal representative. As with any workplace injury case the investigator or claimant will require proof that the injured party and those involved in the incident had received sufficient instruction, information and training. The type of training that was received will require the submission of documentation in the form of powerpoint slides, session plans attendance sheets with the attendee's signature thereon and assessment sheets.

Without the proof that a specific aspect of the training was delivered the company/employer cannot categorically prove that the training was delivered as required. Where there is evidence of a failure to uphold a legal duty, the investigative authorities can use that to influence a prosecution or a claimant can use that to prove that a legal duty was not met and that on the balance of probabilities the required duty of care was not met. In my experience of these matters – failing to provide concrete proof of training to the required standard is tantamount to the company opening their wallets and saying to the claimant 'Help yourself!'

The UK's HSE are requiring that any person engaged in providing workplace training to meet a legal standard undertakes a professional training qualification to the standard of AET. If you haven't done that and you are training dangerous goods awareness sessions, then I would politely suggest that you embark on such a study process. If you have the AET certificate, then I am preaching to the converted and I look forward to hearing your comments on this article.



Should BADGP provide a template training session plan for its members to use as a guidance document? It's a question that I would welcome your thoughts on at our 2023 AGM. BADGP will be at their own table along with our other sponsors – we will be displaying our recent document templates and guidance booklet on Class 7 radioactive substances – perhaps I might bring along a completed session plan or even better- perhaps you could contribute some interesting points from your own training so that we could compile a collective session plan for future members to use to guide them through the early stages in their DG careers.

As always, I look forward to your comments, positive or negative – it is by talking and listening that we reach a consensus and provide a product or service that our members truly need.



Dan Lee, Dan Lee Training Ltd
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BADGP DECEMBER 2022 ISSUE QUIZ - ANSWERS

For those that are curious to know the answer to the quiz set in our final newsletter of 2022, Dan Lee provides the answers to the questions and reveals the message contained within the codeword grid.

No	Question	Answer's First Letter
1	A call for the IMO to declare these as environmentally hazardous (Newsletter issue No.36)	p
	Plastic Pellets	
2	A specific type of fire blanket has been designed for which type of fires? (Newsletter issue....)	L
	Lithium Batteries	
3	A required reading list – we could have prefaced it with the word ‘crucial’ but we didn’t we used another word – the first letter of which is? (BADGP Newsletter issue 39)	E
	Essential	
4	A family member in excruciating pain (Newsletter issue 19)	A
	Agony Aunt	
5	Richard Masters wants to know whether you have been asked for one of these when shipping Dangerous Goods in Machinery (BADGP Newsletter issue 39)	S
	SDS	
6	Who are you in issue 40 featured a BADGP member with an affirmative first name that you could use on the radio	R
	Roger Kagan	
7	The ocular organ featured in Karl Jones article in Newsletter issue 40 that can be easily replaced with a single vowel so that both the word and the vowel make the same sound	I
	I	
8	The first name of the place where an environmental disaster in South Africa occurred that BADGP member Phillip Collyer wrote about in his article in BADGP Newsletter issue 38	K
	Kwa Zulu Natal	
9	An exclamation before a popular family card game (Newsletter issue No 36)	O
	Oooh (Snap)	
10	Usually at the end of our newsletter we get these updates from our partners	N
	News	
11	The first two words of the article by BADGP member Kevin Dougherty that relate to us knowing more about a specific set of regulations BADGP newsletter issue 38	U
	Understanding UN	
12	The first name of the person featured in our first ‘Who are You?’ feature (Newsletter issue No 38)	C
	Clive Savigar	
13	Our Chair starts each newsletter with a message –his first name makes the right impression? (All 2022 BADGP Newsletters)	M
	Mark	
14	A word meaning temporary change that in newsletter No.37 took the Michael	D
	Derogation	
15	An audible improvised explosive device that shares the same first letter in its first two words in an article by BADGP member Richard Masters in issue 39	T
	Ticking Time (bomb)	

Solution:

P	1	<u>O</u>	9
L	2	N	10
E	3	U	11
A	4	C	12
S	5	M	13
R	6	D	14
I	7	T	15
K	8		

P ₁	L ₂	E ₃	A ₄	S ₅	E ₃	P ₁	R ₆	E ₃	S ₅	S ₅
L ₂	I ₇	K ₈	E ₃	O ₉	N ₁₀	O ₉	U ₁₁	R ₆		
S ₅	O ₉	C ₁₂	I ₇	A ₄	L ₂	M ₁₃	E ₃	D ₁₄	I ₇	A ₄
P ₁	O ₉	S ₅	T ₁₅	S ₅						

BADGP GOLF EVENT



An invitation to partake in a pre-AGM golf tournament has generated interest from 4 members, Richard Shreeve Labeline, Kevin Dougherty Air Sea Containers, Karl Durham and our committee representative, Dan Lee. The event will take place in the afternoon, (gather for 1300hrs tee-off expected soon-after) on the 8th March as a preparation for the gathering of the BADGP clan later in the day. We will keep you posted as to the outcome in our next bumper post - AGM newsletter!

WHO ARE YOU?

Andrew Shylan

BADGP would like to introduce you to the 'names' that often get mentioned in BADGP articles, seminars, webinars, and discussions. We would like to offer our members a bit of a professional and personal insight into the details behind the 'name'. This month we feature Andrew Shylan, Dangerous Goods Instructor, AJS HAZ Training.



1. In what year did you start working with DG?

I started working with dangerous goods in 1984 when I had just qualified in the armed forces as a Truck Tanker Fuel (TTF) operator and operated the Unit Bulk Refuelling Equipment (UBRE) to refuel military vehicles in Italy, Denmark, Norway, Germany and Turkey.

2. List three aspects of shipping DG then compared to how it is now?

Fighting in Southampton Port to remove very sticky UK tanker panels and replace all the UK tanker marking with IMDG placards and markings for numerous sea journeys and then removing the IMDG code marking to replace with ADR plates when you got to the port of unloading, to comply with the "Operations at points of Interchange" when switching to different modal regulations. Diesel Fuel tankers that were not even subject to the dangerous goods regulations and marked with "Non-Hazardous Product" marking.

3. In what year did you first become a DGSA and what were the reasons for you becoming a DGSA?

I heard about the new DGSA course that had started around 1998 and wondered how hard an open book can exam be! I thought this would be a natural progression from ADR instructor and I first took my DGSA exams in 2000 and joyfully went off for the day with my borrowed (stolen from the transport office) set of ADR regulations after having the immense pleasure of a DGSA training course in Leatherhead Surrey with Mr Eddie Pargeter who filled in the many gaps in my knowledge of the ADR book, I knew about fuel tankers and ammunition but organic peroxides were a bit of a mystery.

4. What exposure or input have you had into any aspect or content of dangerous goods codes?

I have always read the consultation letters which are produced by the DfT but as I only get involved in training, I am only curious of upcoming rule changes, shifts in regulations and ADR letters submitted by other member states to WP 15 to see the way ADR will develop in time, I have sought to submit a document to try and remove the text "Flammable Solids" from the UN Class 4.1 labels and placards and replace with Flammable Substances or such like.

5. Who was your biggest influence within the world of DG – who did you turn to for advice?

I feel quite humbled to have been given advice and training over the years by some truly giants in the DG community, particularly Eddie Pargeter of EP Training, John Ryan for getting me to join BADGP and Desmond Waight for his help and pointing in the correct direction of some obscure rule in the regulations and several very knowledgeable instructors from the School of Petroleum where I seemed to spend my time on many courses during my military life.

6. What is the most serious DG related incident that you have had to deal with as a DG professional?

I am quite fortunate to have only ever dealt with relatively small spills of flammable liquids and had some slight scorching to my fringe from a lithium battery powered vehicle for one person to ride on, that had been thoroughly abused by a forklift truck and flared as we pushed the article out of the warehouse into the open.

7. What is the most rewarding DG related incident that you have had the pleasure of during your career as a DG professional?

My field of expertise is training and to have a course of delegates trained and having a good understanding of the regulations they will use, whether its road, rail, sea or air, you hope you have made the logistics chain that bit safer.

8. What frustrations do you have in the DG world that could do with being resolved?

I generally get excited about the dangerous goods regulations and now realise my passion for the regulations is not always replicated by some in the dangerous goods world, I do cringe when I hear the words "that we have always do it this way" or when people ask about becoming DGSA's and when you ask about which background they come from in the DG world, they inevitably say they haven't done a DG course but their company has put them on the course as they need a DGSA quick. Would like to see companies take the responsibilities of the dangerous goods trained staff more seriously or give them more time to learn their trade and allow staff to refresh their knowledge before its time to sit their recertification exams.

9. What makes you continue to be involved in the world of dangerous goods?

I believe that now I do some good, I can make companies change their behaviour and keep their employees safe, the regulations keep changing and the regulations continue to develop and expand, this keeps me determined to be up to date and still gives me a sense of a challenge and fulfilment.

10. If you had one dangerous goods wish – what would that be?

If I could rub the magic lantern (UN 3548, Articles containing miscellaneous dangerous goods, N.O.S (Genie)) and grant me a wish then it would be a simple and easy to complete multi-modal transport document for road, rail, inland waterway, sea and air that has the correct columns for the information required and that information is standardised and no adding extra bits that do not seem to add to the safety of the shipment, how a substance can be shown in so many different formats depending on which regulations you are using:

UN1230, Methanol, 3, (6.1), PG II, (D/E), 4 drums Net qty 240 litres

UN1230, METHANOL, Class 3 (Division 6.1), II, (12°C c.c.), 4 drums (1A1) Net qty 240 L

UN 1230, Methanol, 3 (6.1) PG II, four steel drums x 60 L

And give me a second wish and stop making CFR 49 so difficult to navigate around please!

BADGP WEBINARS & EVENTS

Now open for registration:

BADGP 13th Annual General Meeting and Industry Seminar

Thursday 9th March 2023 – Windmill Village Hotel, Coventry

09:00 – 09:30	Welcome and registration; and a chance for a first look at our sponsors' exhibits
09:30 – 10:00	BADGP AGM <ul style="list-style-type: none">• Welcome & apologies• Minutes of 2022 AGM & Approval• Reports• Examined Accounts for 2022• Constitution• Election of Committee Members• Subscription for 2024• Any Other Business (notified in advance by members)
10:00	Industry Seminar: Introduction Mark Spence, BADGP Chair
10:05 – 10:45	<i>The Desmond Waight Memorial Presentation</i> Alternative Fuels And Dangerous Goods Chris Ashley & Nick Deal, Road Haulage Association
10:45 – 11:00	Refreshments & Sponsors' / Exhibitors' Stands
11:00 – 11:45	Lithium Battery Risks Through The Global Supply Chain Michael Yarwood, Through Transport Mutual Services UK Ltd
11:45 – 12:30	Hydrogen Fuel In Road-Side Vehicles Mike Kaye, Energy Oasis
12:30 – 13:30	Lunch and Sponsors' / Exhibitors' Stands
13:30 – 14:45	Hydrogen As A Viable Fuel In Transport Dr Andy Holton, Hazand Ltd
14:45 – 15:00	Refreshments & Sponsors' / Exhibitors' Stands and Networking
15:00 – 15:45	DGSA Development Programme Dan Lee, BADGP Committee
15:45	Closing Remarks BADGP Chair
15:45 to 16:00	Sponsors' / Exhibitors', Informal Discussion and Networking

To register for the AGM & Annual Industry Seminar, please visit: <https://badgp.org/event-4997298>

**For details of all our events and to register, visit the Events page
of the BADGP website:**

www.badgp.org/dangerous-goods-events

NEWS FROM OUR PARTNERS

Chemical Hazards Communication Society

Don't forget that BADGP members have access to some of CHCS's events, webinars, etc. For more information on CHCS, please visit the [CHCS page](#) on our website.



New CHCS webinar coming soon!