



Transport Security Plans – Does yours pass the test?

ADR chapter 1.10 requires the formulation of a security plan for the storage, handling and transport of dangerous goods. Additional measures are required when the goods are defined as “High Consequence” – that is those goods which present a high risk of injury or even multiple deaths or pose a considerable environmental threat if released.

The Carriage of Dangerous Goods Regulations requires us to “test” that plan.

This can be extremely difficult as there are no defined tests written down. This means that ultimately the testing method proves to be entirely subjective on the part of those planning the test.

An exercise was discussed to try to initiate an appropriate and effective test for one client who transports a High Consequence good, in this case an extremely toxic and corrosive liquid chemical of Packing Group I. It is so dangerous that it can only be carried in specially constructed tanks of one inch thick stainless steel with a glass or lead protective inner lining.

Deciding how the test would be planned and executed was an extremely lengthy process which first required the consent and agreement of all contracting parties with an interest. This included the chemical producer who is Israeli based, the shippers and storage companies, the transport contractor, the SQAS auditors the operations teams within the various organisations and the police. The plan was also vetted and overseen by a representative of the Emergency Response organisation who also had influence with the Chemical Business Association.

Once agreement had been confirmed a skeleton plan was put together and this was passed amongst the cohort for approval.

The plan was then discussed with the SQAS auditors for their view - Safety & Quality Assessment System. They strongly suggested some changes from the original concept and advised not to use a loaded vehicle which was the intention, because of the risk level of the product involved.

It was regarded as essential that the plan was executed without the prior knowledge of the driver as the primary function of the test is to assess driver response under duress.



Transportation Safety
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In order to increase the value of the test it was felt that a roadside stop by an unmarked car would be an excellent test method with which the emergency responses could be fully examined. It was felt though that this could only be done with the agreement and assistance of the local constabulary. It was with some trepidation that the Cambridgeshire Traffic Police were contacted and following a successful meeting with Sgt Chris Huggins a basic plan was agreed whereby an unmarked police traffic car would initiate a stop. In addition to the usual routine it was agreed the driver would undergo extensive questioning about security and asked what his responses would be in various different scenarios.

The next problem was coordinating the timing between the parting tank vehicle and Police officers who were on stand-by to perform the stop. This proved extremely problematic and ultimately not achievable as the other demands on our police colleagues precluded the performance of the test. Eventually it was agreed that a watered down test would take place.

This was eventually carried through and was ironically succeeded by a surprise stop by an unmarked police traffic car from a different force area. With the combined results of the two checks a comprehensive assessment was made possible and a number of weaknesses were identified.

Carrying out security plan testing is probably one of the most neglected areas of dangerous goods requirements and it is one of the most commonly picked up faults by inspectors.

Clearly any such test must be documented, it must be meaningful and it must at least confirm that the arrangements in place are fit for purpose or it must make further recommendations to strengthen those arrangements.



GARY SPOONER
Dangerous Goods Safety Adviser / Waste Consultant

Gary is a qualified Transport Manager for domestic and international transport. He has over 30 years experience in the transport industry dealing with the movement of dangerous goods, predominately chemicals, radioactives, gases, fuels and infectious materials. Gary has experience undertaking healthcare waste auditing, including full audits, pre-acceptance audits and duty of care checks. Gary is the appointed Dangerous Goods Safety Adviser for a number of clients throughout the UK.