

FAQs – ADR 2009 INSTRUCTIONS IN WRITING

Q. Who has to provide these to the driver?

A. The carrier

Q. Do I have to provide the full four-page document even though I only carry goods of one of two classes all the time?

A. Yes, the document is a single entity

Q. Can I provide drivers with a document which dedicated to just the classes they carry?

A. You can add an additional page if you wish with the specific information on but it must not be inserted into the body of four-page document thus putting all the pages out of sequence.

Q. Can I add some any specific information by typing it into the document, say on one page 1 or page 4?

A. No. If further specific information is necessary, it should be provided on a separate page.

Q. Can I amend it?

A. No the statements have been agreed and they are being translated into other languages. If you want to give additional information add an extra sheet.

Q. I want to replace the dashes (bullet points) with numbers on pages 1 and 4 as it will be clearer. Is this OK?

A. No the dashes are intentional; numbers could imply a mandatory sequence of actions. Some of these actions may not be required on every occasion.

Q. Do I have to reproduce it on four separate pieces of A4 paper?

A. You can either print it on 4 separate pieces i.e one page per piece or print pages 1 and 2 on the front and back of one piece and pages 3 and 4 on the front and back of another, making just two pieces all together. Other Member States are reproducing theirs in exactly the same format as that in ADR 2009, so to mitigate the risk of attracting fines when on an international journey, we recommend you play safe and stick to 4 pages as per ADR 2009.

Q. What if I only operate domestically?

A. The GB enforcement authorities will accept four pages A4 size or two pages A3 size. For example you could use one piece of A3 paper and fold it in half “booklet style”.

Q. Can I add my company or trade association logo?

A. This will be accepted in GB as long as it does not obscure the text or make it smaller. We don't know how other countries' enforcement authorities will treat such changes. If you operate internationally, we suggest you do not add logos as you could run the risk of attracting fines.

Q. I employ non English speaking drivers and I understand I have to provide instructions in a language that they will understand – is that correct? Where can I get these from?

A. Yes, that's correct. You can download versions in different languages from the UNECE web site. More languages are progressively being added. Follow this link:

http://www.unece.org/trans/danger/publi/adr/adr_linguistic_e.htm

Q. If I'm not carrying dangerous goods that day should the instructions in writing still be visible in the cab?

A. If you're not carrying dangerous goods, then your vehicle should not be placarded or placards should be covered up. To avoid any risk of confusion in the event of a road traffic incident, we suggest you put the instructions in writing in the glove box or out of sight. If you take them out of the vehicle, remember to give them back to the driver the next time you use the vehicle to move dangerous goods.

Q. The list of equipment states that a drain seal is required if carrying goods with danger labels 3, 4.1, 4.3, 8 and 9. What's a drain seal?

A. ADR doesn't specify what a drain seal is. We suggest the following options:

- strong plastic sheeting , held in place by sand, sand bags or by using the shovel to put soil or similar over the sheet.
- specially made drain seals which are available commercially
- The GB enforcement authorities will accept a “sausage” of absorbent material which is sufficient in size to place round a drain opening to absorb /divert any spillage. Commercially available “spill kits” often include such items

- Q. It also states I need to carry a collecting container made of plastics when carrying goods in these Classes. Does the container need to be UN approved?
- A. No. The container needs to be capable of dealing with a spillage, so a typical plastic bucket will be fine as long as the substance carried does not soften or otherwise damage the bucket. Plastic “builder’s” buckets are cheap and readily available, and will be suitable for many substances. The bucket should be in good condition.

Q. The equipment required for certain classes mentions that a shovel, drain seal and plastic collecting container are required for goods with danger labels 3, 4.1, 4.3, 8 and 9. The additional guidance table shows that divisions 6.1 and 6.2 have the hazard characteristics “risk to the aquatic environment and the sewerage system”. Shouldn’t I carry a drain seal and bucket for divisions 6.1 and 6.2 substances as well to prevent leaking substances from getting into the aquatic environment or sewerage system?

- A. There is no requirement to do so. Whilst the list of equipment to be carried on page 4 of the instructions in writing is mandatory, pages 2 and 3 are exactly what they say they are – guidance. This guidance serves as an aide-memoire to the driver. It is not intended to correlate exactly with the list of equipment to be carried.

You may provide additional equipment on your vehicles if you wish, but you should be aware that drivers are not expected to act as quasi-emergency responders and that if extra equipment is provided drivers should be fully aware of what you expect them to do with it and be provided with full training in its use.

If the training that the driver has received means that, where safe and appropriate to do so, he is able to prevent leakages getting into the aquatic environment or sewerage system and contain leaks of substances in division 6.1 and 6.2 by using a plastic collecting container or a drain seal that is laudable.

You should be aware, however, of potential new hazards that may arise. For example, there might be more danger in a driver trying to deal with the leak of a toxic substance or some substances may react dangerously with plastics.

- Q. Equipment is sometimes lost or stolen from vehicles. Is there any rule about where on the vehicle it should be kept?
- A. No. Keep the bucket and other equipment wherever it is convenient and easy for the driver to access. Pre-journey checks should ensure that the right equipment is on the vehicle.