



ADR TRANSPORT SECURITY GUIDELINES

Doc 173/20

Revision of Doc 173/13

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Amendments to 173/13

Section	Change
3.2	Correction to table reference
Appendix 1	Additional text to clarify dangerous goods considered as high consequence

Note: Technical changes from the previous edition are underlined

1 Introduction

Security has always been a concern to the industrial gas companies seeking to keep their goods and assets from being stolen. The development of international terrorism has heightened the awareness that companies should do more. This document seeks to explain the security provisions in chapter 1.10 of the European Agreement on the Carriage of Dangerous Goods by Road, ADR which were first introduced in the 2005 version of ADR.

The guidance given in this publication is divided into two parts; Chapter 4 applies to all gases carried in quantities above the threshold of 1.1.3.6 exemptions related to quantities carried per transport unit. Additional requirements apply for high consequence dangerous goods (refer to Definitions) and guidance on these is given in Chapter 5. These chapters are structured under the sub-headings; People, Procedures and Property. Numbers in brackets at the end of paragraph headings refer to the applicable paragraph(s) of ADR. Additionally, an example of a security plan for high consequence dangerous goods is shown in Appendix 1.

2 Scope and purpose

2.1 Scope

This publication provides guidance for EIGA members on complying with the requirements of the security provisions set out in Chapter 1.10 of ADR when carrying dangerous goods of Class 2., but it does not cover national requirements which may also need to be observed. The security requirements of ADR and the recommendations of this document only apply when carrying goods above the quantities specified in paragraph 1.1.3.6 of ADR. Additional requirements apply to high consequence dangerous goods (toxic gases and bulk flammable gases, refer to 3.2). Members may choose to apply these additional requirements to those non-high consequence gases which may be at high risk of theft, for example gases used in the production of drugs (e.g. hydrogen in cylinders) or used as recreational drugs (e.g. nitrous oxide).

2.2 Purpose

The document covers the transport of dangerous goods by road; other modes of transport are not considered. Transport includes receiving dangerous goods onto members' premises and the entire process of supplying dangerous goods to customers. It includes security during the time that the goods are on the vehicle and held in temporary storage.

NOTE: ADR should be consulted in conjunction with this document. Some national governments and freight associations also provide guidance on the security aspects in ADR.

3 Definitions

For the purpose of this publication, the following definitions apply.

3.1 Publication terminology

3.1.1 Shall

Indicates that the procedure is mandatory. It is used wherever the criterion for conformance to specific recommendations allows no deviation.

3.1.2 Should

Indicates that a procedure is recommended.

3.1.3 May

Indicates that the procedure is optional.

3.1.4 Will

Is used only to indicate the future, not a degree of requirement.

3.1.5 Can

Indicates a possibility or ability.

3.2 Technical definitions

3.2.1 Security (ADR 1.10 Note)

Measures or precautions to be taken to minimise theft or misuse of dangerous goods that may endanger persons, property or the environment.

3.2.2 High consequence dangerous goods (ADR Table 1.10.3.1.2)

High consequence dangerous goods are:

- all flammable gases when carried in tanks, battery vehicles or MEGCs, of more than 3000 litres water capacity;
- all toxic gases in any aggregated quantity exceeding 20 kg when liquefied (50 kg for ammonia and chlorine) or 20 litres water capacity when compressed. These lower limits are those given in 1.1.3.6 exemptions related to quantities carried per transport unit.
- for goods of other classes, table 1.10.3.1.2 in ADR should be consulted.

4 General requirements for all dangerous goods

4.1 People

4.1.1 Recruitment

a) Appropriate persons

Organisations should ensure:

- All employees who are involved with the transport of dangerous goods are suitable for the task and that they hold verifiable:
 - licences, certificates and operating documents where applicable;
 - have permission to work in the country of operation.
- Applicants that give false information, or fail to disclose material information, shall lead to grounds for a refusal for an interview or, if employed dismissal.

Organisations should also regularly verify any licences, certificates and operating documents that staff may need to do their job.

b) Employment checks

Organisations should check the employment record of everyone involved in the transport of dangerous goods, and obtain documentary evidence of background and experience for all potential employees. Original documents should be used to check identities and qualifications.

Wherever possible, organisations should obtain a continuous record of the applicant's education and employment history covering at least the previous five years.

Refer to EIGA Doc 54 *Road Vehicle Safety Programme* for further guidance on the selection of drivers [1]

4.1.2 Selecting contractors

Contractors involved in the transport of dangerous goods should undertake the same pre-employment screening process (4.1.1) as for an organisation's own employees. The company that employs contractors should ask them to demonstrate that they have carried out these checks. If they fail to do so, the employing company should consider using a different contractor.

Organisations should ensure that there are appropriate checks or screening of contractors or sub-contractors or agency staff employed in key positions, such as security guards at site access points, drivers, handling and filling staff.

A good practice is to ensure that organisations have procedures in place to confirm that a person sent by a contractor or agency is indeed the individual who reports for duty.

4.1.3 Training (ADR 1.10.2)

a) Training and awareness

Companies should provide security awareness training for everyone involved in the carriage of dangerous goods. This initial training should be periodically supplemented with refresher training.

The training should include:

- the nature of security risks;
- recognising security risks;
- how to minimise security risks and
- what to do in the event of a security breach.

The training should also include awareness of security plans (if appropriate). This should be at a level appropriate to the responsibilities of individuals and their part in implementing the security plans.

The employer should record all security training and make the records available to the employee if asked.

b) Driver training

Drivers should be briefed on what to do in the event of a hijack or criminal attack. Drivers should see security as a normal, daily routine in the workplace. It should be emphasised that they shall not put themselves at risk in an attempt to protect the vehicle and load.

The depth of the training shall depend upon the type of goods carried.

4.2 Procedures

4.2.1 Management routines and secure working practices

There are a number of procedures that organisations should adopt to improve security.

These should include:

- constantly review operational procedures;
- consider possible risks and always bear security measures in mind;
- keep documentation about the load in a secure place. Criminals could use consignment documentation to show they have title to the goods;
- keep all vehicle/premises keys in a secure place. There should be secure practices for controlling keys to vehicles and premises;
- instruct drivers to secure the cab and where appropriate the load compartment. Where possible, they should lock cab doors when loading or unloading
- advise drivers not to talk about their load or intended route in a public place or over the radio and be careful when asking people for directions or advice on off-road parking.

It is good practice to have in place a security policy statement. This should set down general principles for the secure operation of vehicles and the serious view taken by the organisation of dishonesty, irresponsibility or negligence.

Consignors should offer dangerous goods only to carriers that have been appropriately identified, uniforms alone should not be relied upon as a means of verifying the identity of persons collecting dangerous goods.

4.2.2 Security co-ordinator

One person should have full responsibility for the whole security planning process. This person should have sufficient authority to direct the response to security threats. They should also be involved in the planning and design of the site's exterior security and access control. If an organisation has several sites the organisation may wish to appoint one person with overall responsibility for security but also appoint site-based security co-ordinators.

4.2.3 Truck parking

Transport companies frequently look for details of truck parking facilities; particularly 'secure' truck parking. Information from advertised truck parking facilities is listed in the joint International Road Union (IRU) and European Ministers of Transport (ECMT) booklet *Truck Parking Areas in Europe* - downloadable from the IRU <http://www.iru.org>

Rather than identify individual truck parks as secure or otherwise, the IRU/ECMT booklet lists their security features, including:

- 24 hour guarding;
- video system;
- fenced off parking;
- floodlighting and
- a star security rating.

4.2.4 Maintaining security procedures

Security should be part of the daily routine for all staff involved with the transport of dangerous goods. Drivers, warehouse and yard staff should be trained and make security part of their work.

Ensure that the organisation has clearly formulated standards of responsibility and performance. These need to be understood and accepted by everyone involved in dangerous goods operations.

New staff should be instructed in the security measures applicable to their duties as part of their induction training.

Check regularly that drivers understand and use the security equipment fitted to their vehicles. This also applies for security equipment on premises.

Organisations should arrange regular checks to ensure that all security equipment and control measures are functioning correctly. Above all don't 'fit and forget'.

Organisations should keep up to date with security developments and discuss any problems with the company's security co-ordinator, local police contacts and others in the industry. It is important to make use of actual security events and the experience of others.

4.2.5 Journeys

a) Security on the road – drivers

Drivers should report anything unusual to the appropriate person in the organisation. They should have a mobile phone and comply with any legal or organisational requirements regarding its use.

Drivers should:

- where appropriate, remove the ignition keys, lock the cab doors and switch on any alarm or immobiliser whenever they have to leave the vehicle unattended, even when refuelling or making a delivery;
- refuel on site before setting off whenever possible;
- pre-plan their route and do not stop for non work related reasons i.e. shopping for personal items;
- never leave windows open when away from the vehicle;
- use pre-planned, secure and approved overnight parking facilities where possible.
- lock all doors while sleeping in the cab;
- never carry unauthorised passengers
- never leave the vehicle unattended in a unobserved or unlit area at night. Try to keep the vehicle in sight and be able to return to it quickly if it has to be left unattended;

It should be noted that Chapter 8.4 of ADR has particular requirements concerning the supervision of vehicles.

b) Security on the road – drivers' procedures (ADR 1.10.1.4)

The driver shall carry a formal identity document with photograph. Types of identification may include EU driving licence, passport or a photo ID issued by the driver's employer or other organisation.

4.2.6 Reporting security incidents

If there is a security incident, for example a vehicle or a vehicle's load is stolen or there are any suspicions regarding a possible security situation, the police shall be called. Drivers shall alert the appropriate personnel in their organisations.

EIGA members shall report the incident to EIGA Security Group via the EIGA office, once the nature and outcome of the security incident has been confirmed such that any relevant information can be shared.

4.3 Property

No specific recommendations are made, and EIGA members are recommended to follow their organisations practices for the protection of vehicles and sites.

5 Requirements for high consequence dangerous goods

5.1 People – high consequence dangerous goods

5.1.1 Dangerous goods safety advisor (ADR 1.8.3)

DGSAs are given only one specific role in the ADR's security requirements. They shall satisfy themselves that a security plan exists. They are not required to see the plan or participate in its development, nor are they required to audit compliance with the plan. Companies may choose to involve their DGSA in meeting their security requirements, but this would be because of their knowledge or responsibilities, not due to any legal requirement.

5.1.2 Non-driver employees

Employers may need to consider that non-drivers who have access to, or any operational control over, dangerous goods in relation to transport are similarly checked as drivers are, see 4.1.1. Examples include security guards at site access points, dispatchers, route planners and filling staff. These staff should receive security awareness training.

If any security-related questions are raised these should be discussed with the individual concerned.

5.1.3 Driver training (ADR 1.10.2)

The training programme for drivers should include the following elements.

- Security measures and procedures for the vehicle, load and company premises. It should specifically prohibit unauthorised person(s) in the cab and include guidance to drivers on theft of their load by deception.
- Instruction in the driver's security role, including how to use the security equipment fitted to the vehicle and at the company's premises, where appropriate.
- Hijack awareness and avoidance.
- Reporting suspicious events.

This is in addition to the vocational training certificate that is required by a driver to allow them to drive a vehicle carrying a particular class of dangerous goods.

5.2 Procedures – high consequence dangerous goods

5.2.1 Management routines and secure working practices

Sites receiving or consigning high consequence dangerous goods should:

- schedule vehicle deliveries or collections, wherever possible, so that the arriving vehicle can be cross-referenced against the expected vehicle schedule;
- positively identify the driver and vehicle and
- for those substances identified as having a particularly high risk (e.g. substances with an LC₅₀ less than 200 vppm), advise the customer/receiver an estimated time of arrival. This should include an allowance for traffic and weather conditions as appropriate.

5.2.2 Communication with staff

Ensure that all staff involved with the transport of high consequence dangerous goods understand the need for heightened security measures. Employees are more likely to be reassured than alarmed by such measures.

Companies should have a system of communication that allows all staff to report anything suspicious. Consider setting up a confidential reporting system.

Investigate any reports of suspicious behaviour and consider reporting them to the police.

5.2.3 Security plans (ADR 1.10.3.2)

Carriers, consignors and others engaged in the transport of high consequence dangerous goods should adopt, implement and comply with a security plan.

The plan should identify and reduce security risks related to the transport of dangerous goods. It should take account of the types and amounts of dangerous goods transported and how they are transported.

It should cover as a minimum the elements listed in ADR 1.10.3.2.2.

Consignors should ascertain that carriers have a security programme in place.

5.2.4 Security plans – the three steps (ADR 1.10.3.2)

There are three steps in drawing up security plans.

a) Step one:

Identify the types of threat. Examples are:

- Hijacking of vehicles in transit,
- Theft from vehicles when parked either at base or during deliveries,
- Supplying dangerous materials to those who will misuse them.

The identification of threats should be aided by reference to the following considerations:

- What does the national news say about the current national and international threat level or current terrorist campaigns?
- Are there any relevant previous events?
- What is police advice on the chance of a terrorist attack in the organisation's area of operations?
- Is there something about the organisation's building, operations or staff that could attract the attention of terrorists?

b) Step two:

Identify the products and equipment that may be involved and in particular how vulnerable are they to terrorist attack or being misappropriated, for example theft.

c) Step three:

Identify what the organisation can do to reduce the risk to an acceptable level (it will not be possible to eliminate risk altogether).

At the end of step three there should be a security plan. An example of a plan is given in Appendix 1.

5.2.5 Security plan – implementation

Once plans are made:

- keep them under review so that they reflect changes in supply routes, risks and methods, and personnel;
- test them, by holding regular exercises;
- audit them to ensure that they are still current and workable.

5.2.6 Records

Organisations should keep the following information for all transactions involving a high consequence substance, these records should be kept for the period recommended by the national authority and be available to the appropriate authorities on request:

- name and address of the consignee;
- name of the high consequence substance;
- quantity of the high consequence substance;
- date of supply.

5.2.7 Precautions when taking orders

A sales policy for certain high consequence dangerous goods should be in place. EIGA members should refer to EIGA Doc 920 *Guidance for Qualifying Customers Purchasing Compressed Gases*. [2]

5.2.8 Security on the road – drivers

Drivers carrying high consequence dangerous goods shall:

- carry out a walk-around security check of the vehicle before departing a company or customer site. This includes stops where the vehicle is left unattended during rest/break periods;
- contact their depot whenever they encounter any delay, problem or change in consignment details. The driver should not change the pre-agreed routing without prior confirmation from their scheduler and
- avoid leaving trailers or containers unattended, whether loaded or not. Where possible for long-stay parking use pre-agreed parking areas with approved security devices fitted and fully operational (see 4.2.3).

Drivers should keep their cab doors closed and locked throughout the journey. Where possible, tanker and battery vehicle cabinets or the vehicle's load space should also be kept locked.

Drivers should be instructed not to stop on the road unless required to by the police or other body with the authority to stop vehicles.

5.2.9 Communications and pre-alerts

Vehicles should be fitted with mobile telephones or some other means of two-way communications between the driver and the base. They allow the driver to advise their organisation on arrival at an unoccupied site or to report any suspicious activity and the carrier to keep track of route changes and any overnight parking sites used.

5.2.10 Access procedures

Employers can reduce the 'insider' risk by limiting the access individual employees have to key locations, assets and information to that which they need to do their job. This can be carried out in various ways, depending on the nature of the business.

Examples include:

- physically controlling access to locations housing high consequence dangerous goods; and
- protecting business-sensitive information, whether in hard copy (for example by locking it up securely) or soft copy (using access controls on IT systems).

Unexpected vehicles should be refused entry to a site, until their identity and proof of need for entry has been confirmed – see 5.2.1.

5.3 Property – high consequence dangerous goods

This section covers measures to improve security at sites and on vehicles used for the transport of high consequence dangerous goods. The list is not prescriptive and organisations should make their choices based upon their specific risk assessments.

5.3.1 Sites

Although ADR is primarily concerned with transport, dangerous goods within temporary storage terminals, temporary storage sites, vehicle depots, berthing areas and marshalling yards used for the temporary storage during carriage of dangerous goods are within its scope. These areas shall be secured, well lit and, where possible and appropriate, not accessible to the general public. Site security is therefore relevant to compliance. For site security measures, EIGA members should refer to the document EIGA 922, *Site Security*.

5.3.2 Vehicles

a) Vehicle and trailer records

Details of vehicles, trailers and loads should be available in case the police require them. A daily record of each vehicle's movements with details of the load and the driver on each occasion should be kept.

b) Vehicles security measures

Vehicles may be secured by means of a range of additional security measures. Manufacturers are producing increasingly sophisticated equipment, often running from the vehicle management system. When purchasing new equipment, the anti-theft equipment and other security devices offered by the vehicle manufacturer should be considered.

If feasible and required by the risk assessment, anti-theft equipment may be fitted to existing vehicles. Physical security of commercial vehicles can take the form of such as additional or stronger high security locks, grilles, bulkheads.

Steering column locks are incorporated into virtually all vehicles during manufacture. However, professional criminals can quickly overcome factory-fitted steering locks. Other forms of additional security and immobilisation should therefore be fitted such as:

- Fuel valve immobilisers;
- Starter motor immobilisation;
- Immobilisation of braking systems;
- Wheel clamps and

- Articulated trailer immobilisation – kingpin/trailer leg locks

c) Tracking systems (See Note ADR 1.10.3.3)

Tracking systems are not, strictly speaking, anti-theft devices. But they can help in deterring theft and recovering vehicles. Transport telemetry or other tracking methods or devices to monitor the movement of high consequence dangerous goods may be used where appropriate.

6 References

Unless otherwise specified, the latest edition shall apply.

- [1] EIGA Doc 54 *Road Vehicle Safety Programme* www.eiga.eu
- [2] EIGA Doc 920 *Guidance for Qualifying Customers Purchasing Compressed Gases* www.eiga.eu

Appendix 1

Example of a security plan in accordance with 1.10.3.2 ADR

Appendix 1 details how a particular site could write its security plan to address the security risks it has identified. EIGA members should adapt the requirements to their own circumstances, equipment and security situation.

NOTE: The headings in boxes are based on the text in section 1.10.3.2.2 of ADR/RID. All these elements shall be addressed in the security plan.

Company : XXXXXXXXXXXX

Site / Location : YYYYYYYYYY

A) Allocation of responsibilities regarding security
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In addition to the duties that appointees and other persons had to fulfil prior to 1st January 2005 the following additional tasks shall be performed in accordance with chapter 1.10 ADR/RID

The following functions apply to the location:

Function	Name, First Name
-----	-----
Consignor or Freight Forwarder	XXX, YYY
Loader / Shipping Agent	XXX, YYY
Filler	XXX, YYY
Carrier	XXX, YYY

Based on their job description and/or their assignment, the above mentioned employees are responsible for security.

A.1 Consignor or Freight Forwarder

Only those carriers who fulfil the requirements for carriers are used.

A.2 Loader / Shipping Agent (Transport of unit load)

The loader has to ensure that only products stated on the delivery note are handed over to drivers who have proven their identity.

If in addition to contractual carriers, subcontractors are also used, it has to be ensured that the driver of the vehicle that is to be loaded is in possession of a written loading order.

A.3 Filler (tank-vehicle, battery-vehicle)

The Filler has to ensure, that only products defined within delivery note / transport documents are filled into approved tank- or battery vehicles that are handed over to designated drivers.

A.4 Carriers

All carriers have to observe the rules that are listed under "C", "D" and "H".

A.5 Other Persons

All other employees (filler, staff of shipping and transport department) have to observe the measures listed under "E" and have to be trained accordingly.

B) Record of dangerous goods or types of dangerous goods concerned

In accordance with table 1.10.3.1.2 (ADR) class 2 materials with the following properties are considered as high consequence dangerous goods:

F	flammable
T	toxic
TF	toxic, flammable
TC	toxic, corrosive
TO	toxic, oxidizing
TFC	toxic, flammable, corrosive
TOC	toxic, oxidizing, corrosive

Flammable gases with a classification including only the letter F, are to be considered high consequence dangerous goods in tanks above 3000 litres. Whereas any gases with a classification including the letter T are to be considered high consequence dangerous goods, in tanks or packages in any quantity. See also 1.1.3.6 of ADR Exemptions related to quantities carried per transport unit which allows reduced quantities of the above substances to be carried without the application of section 1.10. Security Provisions of ADR.

C) Assessment of the current operations and the security risk associated with these

The transport of class 2 goods (gases) bears the risk of theft, both that of a single gas cylinder or container or tank and of a complete load or vehicle including tanker or battery vehicle.

C.1) Loading and unloading

In order to minimize the risk of a vehicle being stolen during loading / unloading (also at customer site) it is necessary to take out the ignition key and to lock the driving cab.

To make theft of pallets within packaged goods transport more difficult, the driver should take out the ignition key of the FLT if the vehicle is left unattended for a period of time.

A special case in this respect exists, when a haulier is loading gas cylinders. For this, purpose specific rules are drawn up between haulier / (and) xxxxx to prevent theft.

C.2.) Parking

When the driver has to park the vehicle during rest periods or stop at petrol stations, they shall lock the cab and activate the anti-theft device.

C.3.) Packaging / Labelling

From today's point of view no further dangers/risk can be assumed within the scope of these functions within the framework of chapter 1.10. ADR/RID that are not already mentioned in the rest of the rules and regulations of ADR / RID.

C.4.) Miscellaneous

In addition to the prevention of theft of a vehicle or pallet in case of packaged goods transport as mentioned in paragraph C1 and C2, the protection of individual gas cylinders during a stop during which the vehicle cannot be permanently watched, is to be considered. As it is of highest priority after an accident to clear the damage (to separate the load / separate possibly leaking cylinders), the theft of individual cylinders with toxic content can only be made more difficult by preventing immediate access to the opening mechanisms of the pallets (pallet clamp / ratchet of lashing strap (load securing strap)) through positioning of the relevant cylinders towards the middle of the loading area or to position the pallets as close as possible to each other to make theft of individual cylinders more difficult.

When goods are transported via tanker, battery vehicle or MEGC it has to be ensured that the cabinet is secured during a stop during which the vehicle cannot be permanently watched. Therefore, the cabinet shall be locked at all times (except during loading and unloading).

D) Measures to minimise the security risks
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D.1) Training :

Employee awareness training regarding security

- theft and abuse
- awareness
- procedures to minimise the risk

D.2) Security policy

New employees have to present a clearance certificate; drivers have to have a qualifications certificate or proof of passing of a test based on national/local regulations if applicable.

It is important to observe the requirements for hauliers before signing haulier contracts.

D.3) When an employee is transferred from one job to another, he has to receive relevant training. It is especially important to draw the attention of employees with many years' standing who take up a new job after being transferred to the potential risks which are described in chapter 1.10 ADR/RID (see also paragraph D.1).

D.4) Choice and use of routes:

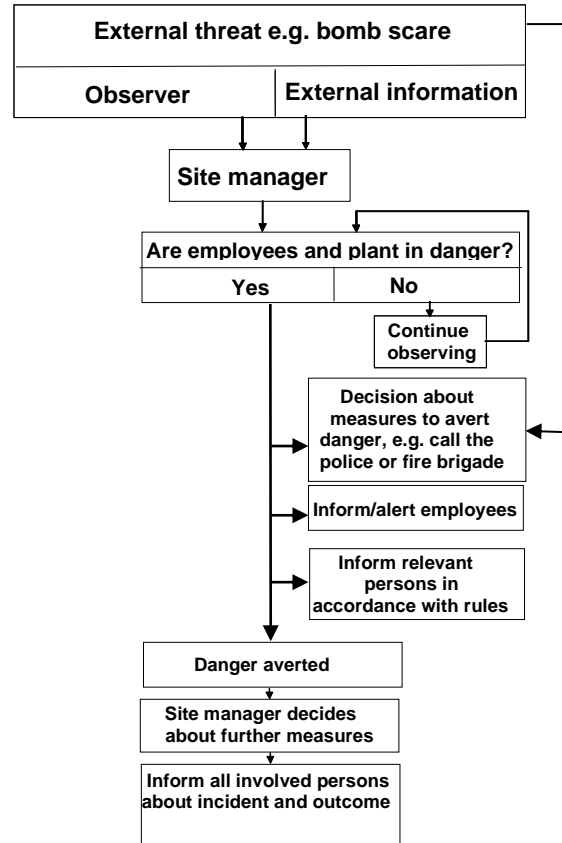
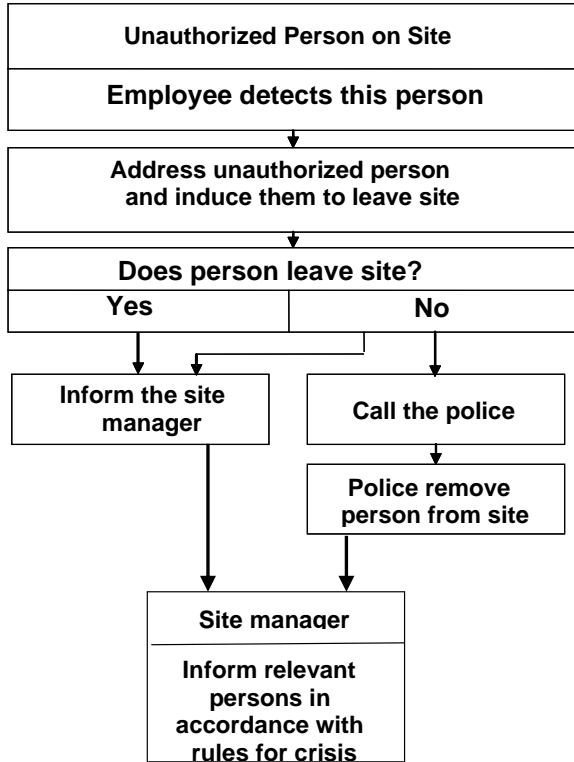
This is covered in national legislation. Further restrictions are not possible because of the supplier / customer locations.

D.5) Use of equipment

In order to prevent access to the transported goods or to at least make access difficult, it is important to strictly adhere to the measures regarding security as stipulated in ADR chapter 7.5 (especially securing the load, lashing strap, side and tail boards, locks).

E) Procedure for reporting threats, security breaches or incidents connected with these occurrences and the actions that have to be taken.

During the legally required training all employees are instructed to report all threats, unauthorised access to site/location to the site manager.



Site Manager Name, XXXXXXXXXXXX
 Location YYYYYYYYYYYY
 Telephone number ZZZZZZZZZZZZ

F) Procedure to assess and test the security plans and procedures for recurring test and updating of the plans.

The site manager shall draw up the security plans. He shall send a copy of the plans to the dangerous goods safety advisor who shall check the security plans as required in the dangerous goods laws. The security plans of the individual areas / locations shall be checked at least once a year to ensure that all information is up-to-date. Especially organisation charts and telephone numbers shall be checked.

Responsibility for this measure lies with the site manager.

G) Measures that ensure that the information about transportation contained in the security plan are inaccessible for unauthorised persons

In order to ensure that no unauthorised person gains access to the information contained in the security plan, the original of this plan has to be locked away by the signatory of the safety plan. The copy of the dangerous goods advisor will be kept locked centrally.

H) Measures that ensure that the information about transportation procedures contained in the safety plan are only distributed to persons who need this information

All persons involved in the transportation process (particularly dispatcher and carrier) shall be instructed (during the training) not to grant unauthorised persons access to the transport documents (delivery note, packing list) or even hand them over to these persons.

Date, location : _____

Site manager : _____