

**PRINCIPAL MARKERS REPORT  
ROAD IRELAND  
JULY 2018**

**CHARTERED INSTITUTE OF LOGISTICS AND TRANSPORT IN IRELAND**

**PRINCIPAL MARKER'S REPORT FORM**

**DANGEROUS GOODS SAFETY ADVISER EXAMINATION**

**SUBJECT: ROAD**

PART TWO – COMMENTS MAY BE CIRCULATED

<b>No Attempting Examination:</b>	30
<b>No Passing Examination:</b>	25
<b>% Pass Rate:</b>	83.33%
<b>Average Mark</b>	39.03

**A. General Comments**

A reasonable set of result. Congratulations to the one candidate who scored 100%.

Candidates had a choice of four case studies. These concerned:

- the domestic carriage of a radioactive material and an oxidising substance
- the international transport of another oxidising substance in UN portable tanks
- the international transport of a solid substance in bulk containers
- the international transport of a mixed load of dangerous good in packaging's.

Just 4% of candidates chose the first. 23% of candidates chose the second. 37% of candidates chose the third while a balance of 36% of candidates chose fourth.

The average marks (out of 35) for the case studies were 20.00, 29.86, 28.89 and 25.89 respectively.

There was a similar theme in both the second and the third case study i.e. the transfer of the UN portable tank or the bulk container from road to rail for a part of the journey. For me this has an effect on how one approaches the marking of the portable tank / bulk container and their carrying vehicles. When a single substance is being carried, it is permitted to move the display of the Hazard Identification Mark and UN number (Kemler plates) to the front and rear of the carrying vehicle – see 5.2.3.1.6. However, I would not recommend choosing this option as when the UN portable tank / bulk container are lifted at the rail terminal from the carrying vehicle, these plates are no longer visible as they will remain on the carrying vehicle if this option were to be followed. In the relevant part of the case studies, candidates were invited to take any consequences there may

be for the rail legs of the journey into account in their recommendations for the marking of the carrying vehicles and the UN portable tank / tank container and forego the 5.2.3.1.6. No one who took the third case study reasoned this out. Just one person who took the second case study showed that s/he had taken this situation into account. DGSA's are required to understand multimodal / intermodal / combined transport – be at least competent in general practice in logistics – or how can they do their job properly, it seems to me. Perhaps trainers could take note and show images of road to rail and vice versa transport taking place to enlighten anyone not familiar these practices?

As is my normal practice, I will just highlight below the major issues insofar as there are any concerning the second, third and fourth case studies. I will not comment on the performances of the first case study as there are so few takers of it.

I continue to remind candidates that if technical names are required after Proper Shipping Names, they must state that Special Provision (SP) 274 applies and give the complete suite of references to the Dangerous Goods List, Table A to discover that this SP applies to the UN number concerned, chapter 3.3 to find out what it means and 3.1.2.8.1 in chapter 3.1 for further explanation as to how SP 274 is to be applied.

There were questions in more than one case study about the small load exemptions of 1.1.3.6.3 of ADR. These were badly answered, candidates seemingly unable to make the link to these exemptions from the wording of the question.

Candidates should note that the “forwarding” country is where a consignment originates and the country to where the goods are forwarded is the destination. Some thought that the forwarding country is the country of destination.

If candidates are asked for the dimensions of placards, they should not neglect the minimum height requirements for the class number in the lower corner of at least 25 mm. Many did so.

As ever I repeat that I expect would-be DGSA's to show they can actually think through the transport situation put to them and apply the rules, not merely quote them off the pages of the ADR. One such type of question concerns the language or language(s) in which the transport document should be written. For example, if the point of origin is Germany, then the requirements of Chapter 5.4 are satisfied with just German is used as it is both the language of the forwarding country and also one of the three official languages of the ADR. There was a question of this kind in the case study. On the other hand some would insist that the forwarding country's language should be used and definitively English because the destination was Ireland. Not so. Under ADR a document, say, for a consignment originating in Denmark could be in Danish and German all the way through to Ireland. After all, on a journey like this German could be good as there could be a long transit of Germany. The Guards and the HSA would just have to cope! Candidates should be taught why the ADR picks the three languages English, French and German so often to the exclusion of others.

When asked to name documents prescribed by Chapter 8.1 of the ADR which should be present from door to door where a sea leg is concerned, candidates should note that the Vehicle or Container Packing Certificate which is primarily an IMDG Code document is *not* required to be present all the way through to destination. Any remaining copies can be discarded after the sea

leg of the journey has been completed – see and study carefully 8.1.2.1 (a) in Chapter 8.1 and the first line of 5.4.2 in Chapter 5.4 of ADR.

One person used the word “transportation” in his/her paper. May I remind that this is incorrect as e.g. exemplified throughout the ADR where the correct word “transport” is used? Transportation is the punishment imposed on felons in the 17<sup>th</sup> and 18<sup>th</sup> centuries who e.g. stole a pig and were banished to places like Australia, Canada, and Tasmania. I hope never to see the word again in DGSA exam papers.

## **B. Comments on Individual Questions**

*Please make comments as appropriate for each question.*

### **Case Study 1A**

I view of the small number who took this case study I will refrain from making any comments on the performances of the candidates who took this case study.

### **Case Study 1B**

The second question in the case study meant that candidates had to find the second table in Chapter 4.2 and read across at the appropriate T-code line. In principle, candidates need look no further for four of the five subparts of this question. One concerned whether a frangible disc (bursting disc, rupture disc) needed to be fitted below the pressure relief valve i.e. “*in series*”.

All that candidates had to do was to find the word “NORMAL” in the appropriate column to know that a bursting frangible disc was not required. Some candidates went to Chapter 6.7 in search of an answer and located 6.7.2.8.1. This was inappropriate as this paragraph allows the fitting of a frangible disc “*in parallel*” as a way of contributing to the overall vapour flow rather than as a protective device for the relief valve.

One of the questions concerned how the transport document for the outbound laden road tanker could be used for the return journey. I wanted candidates to say that the quantity should be struck out and replaced by the words “EMPTY, UNCLEANED, RETURN”. Not everyone worked their way through all the options to reach this one.

The comments made about transfer from road to rail and the marking of carrying vehicles and UN portable tanks with orange plate markings are relevant here. Just one person took the transfer from road to rail into account in his/her solution and even then did not demonstrate a full grasp of the situation.

In a documentation question, candidates were asked in what languages the ADR transport document (CMR Note?) should be prepared. The comments above about the languages of the transport document and how to answer such questions are relevant to this case study.

### **Case Study 1C**

Candidates should understand that carriage in bulk is *not* the same as carriage in tanks! One thing would-be DGSA's have to learn to cope with is the use of terminology in the ADR which may be different from everyday workplace usage. This is one such case. From the point of view of ADR, for example, to say “bulk tanks” is an oxymoron and can lead one astray in trying to apply

the provisions of ADR. One or two candidates who took this case study did this.

The comments made about transfer from road to rail and the marking of carrying vehicles and UN portable tanks with orange plate markings are also relevant here. Not one person took the transfer from road to rail into account in his/her solution.

The comments made above about the height of the class number on placards made above are relevant to this case study. 67% of candidates who took this case study omitted this detail when asked about the dimensions of placards.

### **Case Study 1D**

My comments above about the languages of the transport document are also relevant to the way this case study was answered. My comments about the Vehicle/Container Packing Certificate above are also relevant here. 36% of candidates who took this case study fell into this trap.

A significant part of this case study concerned whether the four items making up the consignment could be carried as a *mixed load*. Two candidates made the mistake of thinking this was a *mixed packing* question and as a result did not do very well on it. More significantly candidates should have removed one of the items from consideration as it was a Limited Quantity. Limited Quantities consignments are exempted from the mixed load considerations – see 3.4.1 (g). Virtually everyone made this mistake.

The last question in this case study concerned the small load exemptions of 1.1.3.6.3. 55% of candidates who took this case study either could not attempt it or missed the point of the question and tried some other inappropriate solution.

### **The Part B Questions**

Question 1: This concerned the languages in which the driver Instructions in Writing should be issued and by whom. Most got it right though one or two thought it was the consignor's duty to issue this document when this changed long ago to be a carrier duty.

Question 3: This was a question concerning whether a substance carried in tanks counted as a High Consequence Dangerous Good for which a security plan had to be prepared and implemented according to the provisions of Chapter 1.10 of the ADR. One or two candidates attempted this incorrectly from the S provisions and Chapter 84 which does not work for this question. 13% of candidates either could not attempt it or tried to provide an answer from some other part of ADR.

Question 4: In this three part question candidates were asked about the carriage of passengers. It was well answered on the whole.

Question 5: The final question concerned the requirements of 1.8.5 of ADR to report incidents in specified circumstances to the national competent authority. Most candidates answered the first two parts of this three part question which concerned the thresholds at which such reporting should take place but I got all sorts of answers as to whose duty it is to prepare these reports. Some said the DGSA. Some said the “contracting party”, some said the UNECE (that is who they go to eventually), some said “consignor” and some said the

“competent authority”. The correct answer is given in 1.8.5.1 being any of the loader, filler, carrier, or consignee.

**C. Comments on Candidates' Performance (include identification of any gaps in knowledge\areas of weakness)**

Any comments appear above.

**D. Comments on the Marking Process**

None.

SIGNATURE: .....DATE: 10.04.2018