

# **Compliance (as consignors), with the carriage of dangerous goods on the road**

## **Queen Mary University of London Health and Safety Policy**

(Ref: QMHSD\_HS\_PCY033 CDG Policy Version 1)

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## 1.0 Executive Summary

1.1 This Policy outlines how Queen Mary University of London (Queen Mary) ensures that it fulfils its legal and moral duties when it consigns dangerous goods by road in the UK. The Policy applies to the movement of biological samples and similar research material which are completed under existing detailed procedures. There are some materials called High Consequence Dangerous Goods (HCDG) where additional security measures are required.

1.2 The Policy specifically deals with our role as “Consignors” of dangerous goods. The regulation of hazardous substances, biological agents, hazardous wastes, and transport of dangerous goods is a complex area, and this Policy is precise in what it covers; and equally what is not covered.

## 2.0 Introduction

2.1 The UK enforces the EU standard for the transport of dangerous goods by road. One of the requirements relates to those who consign goods by road, which would include activities such as the disposal of hazardous waste. To comply, Queen Mary is required to have consignor procedures and access to Dangerous Goods Safety Advisors (DGSA's – this is plural as some dangerous goods classes need very specific advice).

## 3.0 Purpose

3.1 This Policy outlines how the University meets its legal duties with regard to the consignment of dangerous goods for road transport using qualified and competent third-party transport companies.

3.2 To ensure compliance, we are required to have access to competent advice on the transport of dangerous goods from a Dangerous Goods Safety Advisor.

## 4.0 Scope

4.1 This Policy applies where Queen Mary consigns dangerous goods for transport by road in the UK, with the transport being conducted by competent transport providers.

4.2 It applies to the transfer of infectious / biological samples (human or animal) between UK Queen Mary campuses when conducted under the existing and comprehensive biosafety procedures.

4.3 The Policy explicitly requires a more detailed assessment and controls where Queen Mary consigns:

- UN Class 7 Radioactive materials.
- From overseas campuses (e.g. Malta School of Medicine - Gozo Campus).
- to supply hazardous substances to other organisations. There is complex legislation and requirements if this is to be done legally; this would include substances given with no cost.

4.4 The Policy excludes:

- Queen Mary operations where the University acts as the transporter of dangerous goods. If these activities are to be completed, they are to be assessed and approved by the Queen Mary DGSA.
- Contractor-related waste, e.g. from asbestos stripping activities.

- Explicit legislation dealing with the management of hazardous waste, e.g. retention of waste consignment notes.
- Air or Sea transport of dangerous goods.
- UN Class 1 Explosives and related compounds. These are prohibited from Queen Mary buildings unless the Head of School / Institute has signed off on their purchase and use and has ensured all legal requirements have been met.
- Dangerous goods carried under the ADR exemption for “specific exemptions for goods carried by tradesmen (and others) when the carriage is ancillary to their main business activity, such as for use with a machine or process on site.”

## 5.0 Legislation

5.1 The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (“CDG 2009”), SI 2009 No 1348. Abbreviated to CDG in document.

5.2 The Regulations implement ADR 2025 (with several exceptions). The main duties are now covered by a single regulation, namely Regulation 5. ADR 2025 - Agreement concerning the International Carriage of Dangerous Goods by Road. Abbreviated to ADR in the document.

## 6.0 Terms and Definitions

### 6.1 Terms relating to groups and classes of materials and items

- **Dangerous Goods** – Term used for goods classified as dangerous to transport under ADR.
- **Hazardous waste** - Term used in environmental legislation for wastes, many of which can also be dangerous goods, for items and substances where their movement and disposal are strictly regulated.
- **Hazardous substances** - Term used for substances used, stored and processed in the workplace, e.g. use of laboratory chemicals in research. Usually related to health hazards. E.g. carcinogen. This classification adopts the EU Model, via UK legislation. This also includes biological samples and associated packaging including agents to retain cold temperature e.g. dry ice.
- **Dangerous Substances** - Term used for substances used, stored and processed in the workplace, e.g. use of laboratory chemicals in research. Usually related to physical hazards, e.g. flammability.
- **HCDG** - High consequence dangerous goods, including explosives. Relates to security and the prevention of crimes such as terrorism.
- **Consignment of Dangerous Goods** - Identifying hazards, packaging, marking, labelling and providing documentation ready for transport.

### 6.2 Specific roles

- **Consignor of dangerous goods** – Organisation (includes individuals employed by the organisation) that consigns dangerous goods for transport on UK roads.
- **DGSA** - Dangerous Goods Safety Advisers (DGSAs) help prevent the risks involved in the carriage of dangerous goods. This includes risks to people, property and the environment. There are specific requirements related to competence to fulfil this role.

### 6.3 Regulators

- **ONR** - Office for Nuclear Regulation, which regulates aspects including the transport of radioactive wastes.
- **DfT** - Department for Transport's (DfT) Land Transport National Security Division (LTNSD) security compliance programme relates to the consignment, security and transport of High Consequence Dangerous Goods (HCDG).
- **HSE** - Enforce CDG.
- **EA** - Enforce the transport and disposal of hazardous wastes.

### 6.4 Codes and standards for different modes of transports

- **CDG** – Legislation that dealt with the transport of dangerous goods in the UK, enforced largely by the Health and Safety Executive (HSE) and the Police.
- **ADR** - EU legislation, adapted from UN requirements and adopted into UK legislation via CDG.
- **IATA** - The International Air Transport Association (IATA) is an international set of standards on all aspects of commercial flights, including the carriage of dangerous goods.
- **IMDG** - The International Maritime Dangerous Goods (IMDG) Code. It is an international set of standards on many aspects of maritime activities, including the carriage of dangerous goods.

## 7.0 Roles and Responsibilities

7.1 Outline of key duties and responsibilities of the stakeholders involved in the consignment of dangerous goods, including hazardous wastes.

### 7.2 Health and Safety Directorate (HSD)

- **Policy:** Drafts, consults on the document, and monitors the Policy.
- **Monitoring:** Monitor the implementation of the Policy through periodic audits, inspections, and reviews of documentation, e.g. waste consignment notes.
- **Organising and managing hazardous waste collections for laboratory areas.** Coordinates the collation of the waste lists. Liaises with the Schools/Institutes and the waste contractors to manage the waste pick-up process. Holds records of laboratory wastes that are transferred off-site and associated Hazardous Waste Consignment Notes.
- **Selection and monitoring of the DGSA.** To select, monitor and liaise with the DGSA to ensure appropriate and competent services are provided to Queen Mary.
- **Ensuring training of consigners with Schools, Institutes and Directorates.** In consultation with the DGSA, we will advise and support the delivery of the competence programmes for those with responsibilities as consigners within the schools and EAF.
- **Collate, store and monitor non-EAF hazards waste consignment notes.** These will be retained on the HSD SharePoint site in line with the Queen Mary Retention policy and three years from the date of transfer as a minimum.
- **Supervise the collection of dangerous goods in HSD Stores,** e.g. hazardous wastes, held in HSD stores, including radioactive wastes. Can support local collections from other stores if requested and there is a need.
- **Ensure there is an appropriate security plan** in place for hazardous substances; but this is particularly important (and a legal requirement) for the transport of HCDGs, including their pre-pick-up storage.

### 7.3 Estates and Facilities (EAF)

- **Control the movement of EAF-generated hazardous wastes.** Some of these hazardous wastes are also classified as Dangerous Goods as defined. This control will include the creation of EAF procedures and processes; and relevant training where required.
- **Manage EAF Dangerous Goods and Hazardous Waste movements.** Collate, store and monitor EAF Hazardous Waste Consignment Notes. Ensure any transport and waste carriers are competent. Either use the Queen Mary DGSA's as needed or appoint their own competent DGSA's. Ensure any staff who move loads and consignments between campuses are aware of restrictions. These would include LPG cylinder movement for catering events. They must comply with the ADR Limited Quantities exemptions such as driver training.
- **EAF Competent person:** Appoint a competent person within EAF to monitor EAF procedures and processes.
- **EAF Security.** To advise on and support the Road/Rail Transport Security Plan e.g. provision of appropriate CCTV and support any incident response plans.

### 7.4 DGSA

- **Advise on Queen Mary H&S Policy** and associated procedures, including ensuring the competence of staff who consign dangerous goods.
- **Advise on any dangerous goods consignment** where the existing procedures and processes require explicit support. These include, but are not limited to, the transport of explosives.
- **Advise on the competence of third-party transport providers**, including hazardous waste companies, who transport Queen Mary wastes.
- **Conduct periodic reviews or audits** of the Queen Mary Dangerous Goods system.
- **Advise on the Road/Rail Security Transport Plan.** This is specifically for HCDGs.

### 7.5 Procurement

- Ensure all carriers engaged in transporting dangerous goods, which includes hazardous wastes, have been checked to ensure fully compliant with ADR as required by the UK CDG Regulations.
- For carriers who transport HCDGs, ensure they are aware and implement the enhanced duties required by ADR.
- For carriers of hazardous waste, must meet the requirements of the EA and environmental legislation.

### 7.6 Schools / Institutes, Estates and other Directorates that generate loads that need to be transported and are classified as dangerous goods.

- **Collate lists of goods for transport.** Collate goods for transport, involving hazardous wastes, and ensure the lists are accurate, including hazard phrases.
- **Use either HSD stores or School/Institute stores.** Either transport the wastes on campus to the HSD hazardous waste stores, following the existing procedures, or use the School / Institute's own stores under local control.
- **For Schools / Institutes with their own hazardous waste stores**, e.g. at Joseph Priestley, Engineering and Blizard Buildings, the School / Institute will ensure that they supervise the collection of dangerous goods in line with this policy. In this case, copies of all documents must be returned to HSD.
- **Ensure there is an appropriate security plan in place** for hazardous substances; but this is particularly important (and a legal requirement) for the transport of both dangerous

goods and HCDGs; with additional requirements for HCDGs, including their pre-pick-up storage.

- **For staff handling HCDGs.** Consideration to additional security checks e.g. Disclosure and Barring Service (DBS) check.

### 7.7 Waste carriers and other dangerous goods transport providers

- **DGSA.** Have access to a qualified DGSA who ensures full compliance with CDG, CPL, and ADR.
- **Known driver.** Will ensure the driver is pre-notified and carries ID.
- **Documentation.** Will provide all documentation in advance, on the day, for consignment notes, with completed consignment notes sent to Queen Mary when transit/disposal is complete.

## 8.0 Policy / Operational Arrangements

### 8.1 Overview and link to the hazardous waste processes for:

8.2 The Consignment Journey – Laboratory Hazardous Wastes, Biological/ GMO materials and radioactive materials for transfer is included in Appendix 3.

### 8.3 Consignors' responsibilities.

- Ensure Queen Mary competency is up to date and recorded on the CPD system.
- The process for Schools and Institutes is listed below; for EAF, they will need to create their own process and documented procedures.
- For wastes or consignments, you will need the following information:
  - Ensure the carrier is on the Queen Mary approved list who meet the requirements of ADR for the loads they will transport; and for hazardous wastes meet requirements of the EA.
  - List of materials for collection. The list must contain the classification and accurate description of the materials. This should have been checked to ensure no prohibited items; these include explosives and explosive precursors. If unsure, consult HSD.
  - Who is responsible for the packaging and labelling must be clear. With wastes this is often the waste carrier; for other materials it is the school consigning the waste.
  - Know the date and time of collection.
  - Know the name of the organisation taking delivery of the items and the name of the driver. There must be a formal check of both the driver's identification and the company details. This will include the drivers ADR Licence.
  - Ensure all relevant documentation is in place including a Dangerous Goods Note (DGN) or Dangerous Goods Declaration (DGD) which is a mandatory transport document used to inform carriers, handlers, and authorities about the hazardous nature of a consignment. It must accompany dangerous goods for road, rail, and sea transport providing critical UN numbers, proper shipping names, classes, and packing groups. This can be the transport company or Queen Mary, but we must ensure it has been completed.
  - Unlock the secure store and provide access to the items for removal.
  - Prior to leaving site, ensure only items for collection have been removed, no items have been left behind; there have been no issues with the collection, e.g. spills or accidents.

- Any adverse events must be reported to your line manager, and if a major emergency reported to Security for the instigation of the major incident plan.
- Sign and take a copy of the consignment note. This must be scanned and emailed to HSD.
- Secure the store and return the key to its safe storage space.
- For consignors of HCDGs, the Road/Rail Transport Plan, a confidential document, must be implemented. These substances must pass directly from Queen Mary to the approved carrier and must not be left with an untrained third party e.g. the post room.
- There should be an agreed process for the return of empty bottles to suppliers where this arrangement is in place. This process must ensure the bottles are cleaned or contents have evaporated for solvents, caps are removed, and a waste transfer note is provided.

#### **8.4 Training and Competence programmes for staff who consign waste.**

8.4.1 Consignors must be able to demonstrate competence in the following areas, and their competence must be recorded on the CPD system. This can be supplemented by training on the knowledge required and the overall process at Queen Mary. Training will align to the relevant requirements of ADR.

- Can differentiate dangerous goods; hazardous wastes; HCDGs.
- Can describe the key steps of the process and describe their role in the process.
- Can identify the correct action if unexpected or prohibited items become apparent during the process.
- Can describe the action to be taken in the event of a minor incident and a major incident.
- Can describe the roles of the stakeholders in the Queen Mary Process.
- Can describe the security requirements related to the consignment of dangerous goods, and the additional requirements in place for HCDGs.
- For any staff involved in consigning HCDGs must be aware of the Road/Rail Transport Plan, a confidential document, that deals specifically with HCDGs. Access to this restricted document will be provided to relevant staff. For this group of staff, a two-yearly refresher of training is generally required and training records retained for 6 years.

#### **8.5 The Transport of HCDG and Radioactive materials**

8.5.1 Queen Mary Dangerous Goods Classes where extra checks are required: HCDG and Radioactive materials.

- 2.2 & 2.3 Toxic gases
- 6.1 Toxics (PG1 Highly Toxic).
- 6.2 Category A Infectious Substances.
- 7. Radioactive materials, sources and wastes (above specified thresholds).

8.5.2 If any of these items are identified but are not listed on the approved waste disposal or transfer documentation issued by HSD / consignor, the sending or collection must be abandoned and the matter reported to:

- Line manager
- HSD
- Head of School / Institute / Directorate

8.5.3 An assessment of next steps will be made with a focus on the safe handling of the items or materials and ensuring compliance with the required legislation.

## **8.6 Process to collate, review, store and report on dangerous goods and hazards wastes transfers.**

### **8.6.1 HSD: Hazardous Laboratory Wastes**

- Collate lists from all campus stores (currently Mile End - five stores in three locations, Charterhouse Square - two stores in one location, Whitechapel - one store). Identify any prohibited substances or items or HCDGs.
- Organise collection with a pre-selected and competent carrier and/or hazardous waste management organisation.
- Organise for a competent consignor to be available, either from HSD or the relevant School to monitor and check the pickup. This includes making sure that all items collected and no additional items are removed. Check the driver's ID to ensure they are from the expected organisation and that their name matches the document name of the person assigned to collect the waste. If not pre-notified can contact the organisation by phone to verify the driver's identity.
- The store is to be secured after the pickup.
- Ensure a copy of the consignment note is checked and scanned and uploaded to HSD SharePoint site. Documents retained for at least 3 years.

### **8.6.2 HSD: Hazardous Laboratory Clinical Waste**

- Organise collection with a pre-selected and competent carrier and/or hazardous waste management organisation. Ensure the vehicle and driver know the store location and how to safely access. The bins are secured and provided by the clinical waste disposal company.
- Ensure a copy of the consignment note is checked and scanned and uploaded to HSD SharePoint site. Documents retained for at least 3 years.
- Periodic review of service and compliance.

### **8.6.3 HSD: Hazardous Laboratory Infectious Substances / Biological / GMO Samples for Transfer**

- Advise in line with current detailed bio-safety procedures.
- Advise on correct assessment of any other hazardous material, e.g. dry ice or liquid nitrogen; and local lab managers ensure the receiving organisation is ready for receipt on arrival.
- Check that transfer documentation is completed correctly and retained by S/I during periodic HSD inspections and audits

### **8.6.4 HSD: Radioactive Waste and materials**

- Radiation Protection Officer (RPO) in HSD obtains lists from IsoStock and/or local Radiation Protection Supervisor (RPS). Identify any prohibited substances or items or HCDGs, consult with Radiation Waste Adviser (RWA) as applicable. Ensure collection is within the terms of the EA Permit. If not, it must be reported to the EA. Ensure the Transport and Security Plan is in place and current.
- Organise collection with an authorised pre-selected and competent radiation waste management / disposal company. Check the driver's ID to ensure they are from the expected organisation and that their name matches the document name of the person assigned to collect the waste. If not pre-notified can contact the organisation by phone to verify the driver's identity.

- RPO or an authorised RPS to monitor and check the pickup. This includes making sure that all items collected and no additional items are removed. RPO or an authorised RPS sign the consignment documentation.
- The store is to be secured after the pickup.
- RPO ensure a copy of the consignment note is checked, scanned and uploaded to the HSD SharePoint site. Documents retained for at least 3 years.
- RPO updates IsoStock.
- Transfers of radioactive material from Queen Mary to other organisations, not just waste - but recorded on IsoStock within permit limits of both sending and recipient organisation, managed by local RPSs. Local procedures and for above threshold Class 7 transport plan required.

### **8.6.5 Process to recruit and engage with the DGSA.**

8.6.5.1 HSD will select and manage the relationship with a Queen Mary DGSA or DGSAs to ensure all activities and dangerous goods are covered.

8.6.5.2 EAF, if they operate different processes and transport or waste companies, can select their own DGSA or use the QM DGSA.

## **9.0 Further Information**

9.1 Links to:

- ADR, CDG, ONR, EA and HSE sites.
- DGSA contact details.
- HSD website.
- Road Transport Security plan- focuses on HCDG security (DfT required plan).

## **10.0 Appendices**

- Appendix 1 Queen Mary Hazardous Substance Summary.
- Appendix 2 ADR/ CDG Classes
- Appendix 3 The Consignment Journey – Laboratory Hazardous Wastes and Biological/ GMO materials for transfer

## Appendix 1 Queen Mary Hazardous Substance Summary

Type of goods/wastes	Dangerous goods for transport	UN Class	Hazardous wastes for disposal <sup>1</sup>	HCDG	Notes
Hazardous chemical waste	Yes	2-5 6.1 8	Yes	6.1 PG 1 2.2 and 2.3 Toxic gases	
Explosives including explosives waste.	Yes See note before disposal or movement.	1	Yes		Must contact HSD before purchase; if on site contact HSD before disposal.
Clinical waste / biological samples / GMOs	Yes	6.2 9	Yes	6.2 Cat A	
Radioactive waste / materials / sources	Yes	7	Yes		Needs Transport and Security plan above specified thresholds
Fluorescent tubes and low energy - excluding LED and other gas discharge lamps	In some cases.	Needs to be assessed	Yes		
Propane Gas Cylinders / others	Yes	2.1	Yes		
Domestic seating waste containing POP <sup>2</sup> s	In some cases.	Needs to be assessed	Yes		
Small Mixed WEEE containing POPs	In some cases.	Needs to be assessed	Yes		
Fridges and Cooling Equipment - Containing Ozone Depleting Substances	In some cases.	Needs to be assessed	Yes		
Screens/ Monitors/ Televisions (CRT) Flatscreens (Plasma or LCD) containing POPs	In some cases.	Needs to be assessed	Yes		
Estates related Hazardous Products	In some cases.	Needs to be assessed	Yes		EAF Classification

<sup>1</sup> Dangerous goods for transport; and hazardous wastes from an environmental protection perspective can differ.

<sup>2</sup> Persistent organic pollutants

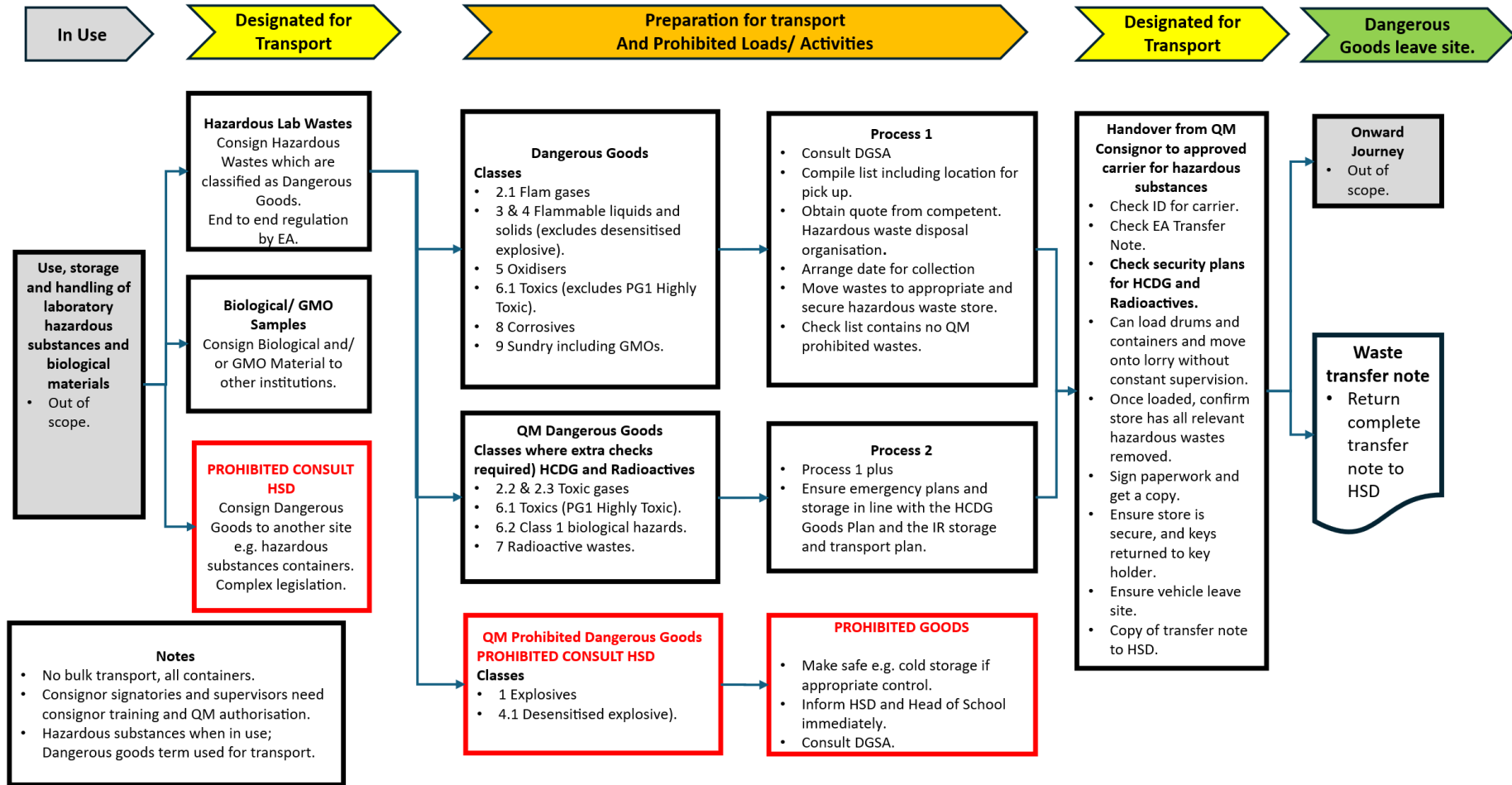
## Appendix 2 ADR / CDG Classes

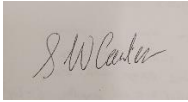
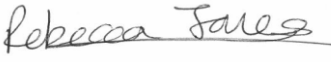
There are nine classes, some with divisions, as follows. Plus DfT enforced HCDG.

UN Class	Dangerous Goods	Division(s)	Classification	High consequence dangerous goods (HCDG)
1	Explosives	1.1 - 1.6	Explosive	No explosive materials to be purchased or created without approval.
2	Gases	2.1 2.2 2.3	<ul style="list-style-type: none"> <li>Flammable gas</li> <li>Non-flammable, non-toxic gas</li> <li>Toxic gas</li> </ul>	2.1 NA in containers. 2.2 and 2.3 applies. E.g. lecture bottles.
3	Flammable liquid		Flammable liquid	NA in containers.
4	Flammable solids	4.1 4.2 4.3	<ul style="list-style-type: none"> <li>Flammable solid</li> <li>Spontaneously combustible substance</li> <li>Substance which in contact with water emits flammable gas</li> </ul>	<ul style="list-style-type: none"> <li>NA in containers.</li> <li>Desensitised explosives as Class 1.</li> </ul>
5	Oxidising substances	5.1 5.2	<ul style="list-style-type: none"> <li>Oxidising substance</li> <li>Organic peroxide</li> </ul>	NA in containers.
6	Toxic substances	6.1 6.2	<ul style="list-style-type: none"> <li>Toxic substance</li> <li>Infectious substance</li> </ul>	<b>6.1</b> <ul style="list-style-type: none"> <li>PG 1 Toxics e.g. sodium cyanide.</li> <li>NA in containers.</li> </ul> <b>6.2</b> <ul style="list-style-type: none"> <li>Infectious substances of Category A.</li> <li>Other 6.2 Category B - N/A.</li> </ul>
7	Radioactive material	7	Radioactive material	Regulated by ONR
8	Corrosive substances	8	Corrosive substance	NA in containers
9	Miscellaneous dangerous goods	9	Miscellaneous dangerous goods	NA

Appendix 3 The Consignment Journey – Laboratory Hazardous Wastes and Biological/ GMO materials for transfer

The Consignment Journey – Laboratory Hazardous Wastes and Biological/ GMO materials for transfer



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