WHITE PAPER
DGSA 25 YEARS LATER

IASA

DGSA 25 YEARS LATER

International Association of dangerous goods Safety Advisers

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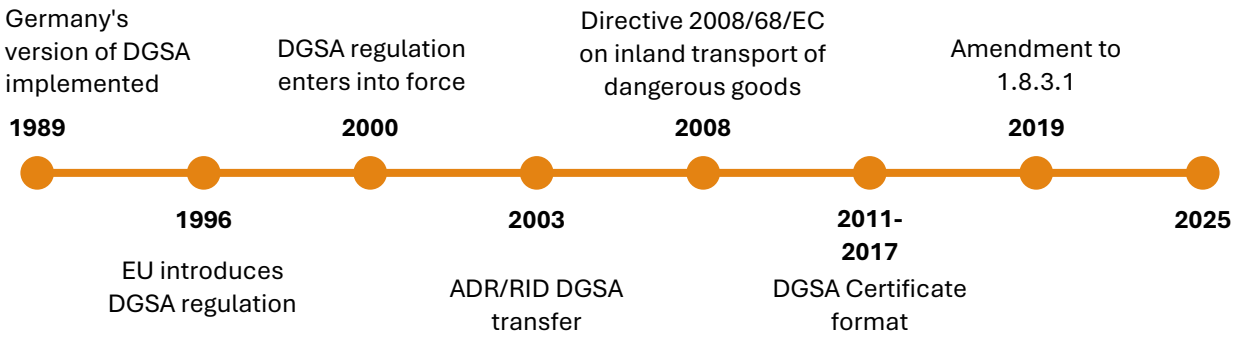
Introduction

More than twenty-five years have passed since the requirement for undertakings involved in the transport of dangerous goods to appoint one or more Dangerous Goods Safety Adviser (DGSA) was introduced in Europe. The requirement was established to strengthen safety performance, improve regulatory compliance, and support the systematic management of risks associated with dangerous-goods transport. Since its introduction, the role of the DGSA has continued to evolve. Specifically, following the terrorist attacks in the United States on 11 September 2001, the regulatory framework was further developed to incorporate security considerations alongside traditional safety requirements. As a result, the DGSA function now forms part of a broader safety and security framework for the transport of dangerous goods.

This white paper examines the development and implementation of the DGSA requirement from its introduction to the present day. It considers the regulatory background that led to the establishment of the role, the subsequent evolution of the legal framework, and the way the requirement is currently applied in practice across different countries.

The analysis is based primarily on responses received from IASA member associations and covers twenty-one countries. These responses are supplemented, where relevant, by information from authoritative sources, including the United Nations Economic Commission for Europe (UNECE), EUR-Lex and academic research. The combined material provides a basis for assessing how the DGSA requirement has been transposed, interpreted and applied at national level.

The purpose of this white paper is not only to describe the current regulatory situation, but also to identify areas of divergence between countries. Particular attention is given to differences in scope, exemptions, administrative requirements, accountability, annual reporting, training and examination systems, and recognition of DGSA competence. By highlighting these differences, the paper seeks to support informed discussion on whether further clarification, alignment or harmonisation may be beneficial. The data and conclusions shall be seen as a “snapshot in time” as the data was collected end 2025 and beginning 2026, prerequisites could have changed after this data collection period.



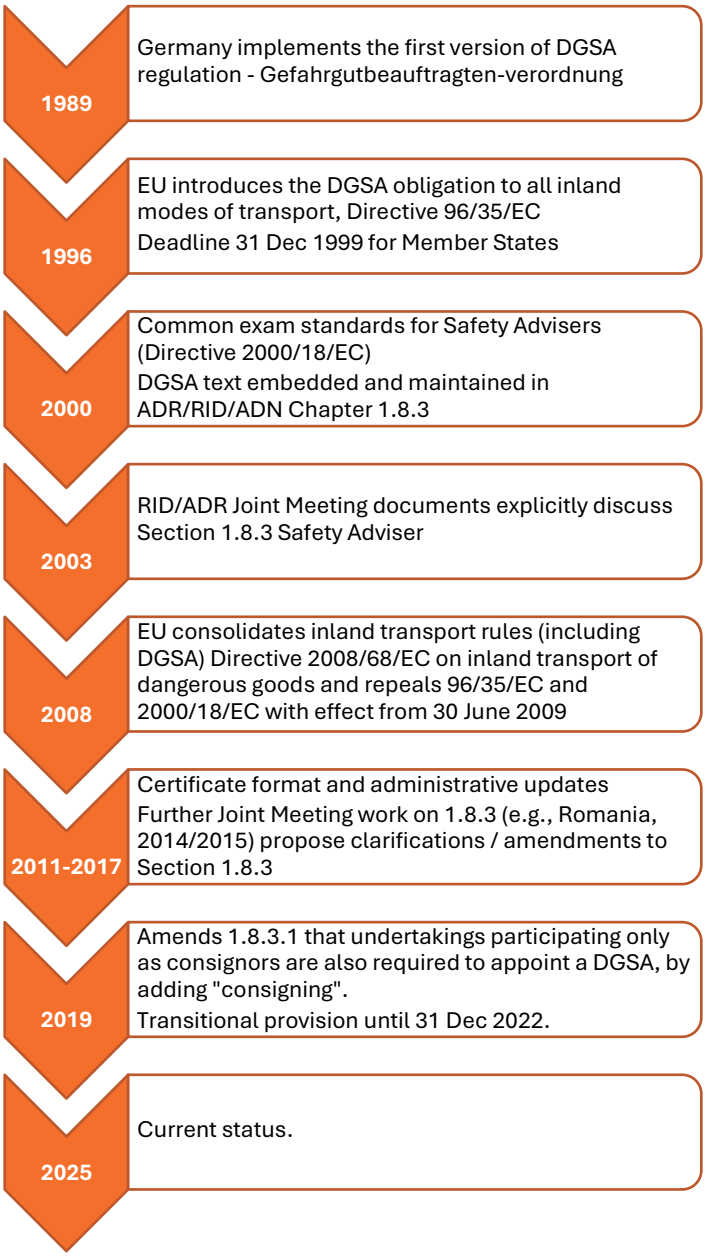
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The intent and development of Dangerous Goods Safety Adviser

The DGSA requirement is more than a technical provision. It emerged from concerns about safety, regulatory harmonisation and accountability in the late 1980s. The DGSA supports businesses and authorities in ensuring the safe, secure and compliant transport of dangerous goods. Its role and requirements should therefore evolve to address the challenges of the time.

The underlying objective of the European Union (EU) legislators was to embed accident prevention within undertakings involved in the transport of dangerous goods by requiring the appointment of a qualified advisory function, while at the same time reducing disparities between national regulatory approaches and supporting harmonised safety conditions within the internal market.

Directive 96/35/EC constituted the first harmonised European framework establishing the role of the DGSA. Its primary purpose was to enhance safety in the transport of dangerous goods and to prevent risks to persons, property, and the environment inherent in such activities. This objective was to be achieved by "ensuring an acceptable level of professional competence" within undertakings engaged in the transport of dangerous goods or in related loading and unloading operations. To this end, Member States were required to ensure that such undertakings appointed one or more suitably qualified Safety Adviser.



The preparatory works preceding the adoption of Directive 96/35/EC consistently emphasised the preventive dimension of the proposed measure. They highlighted that compliance with existing transport rules alone was insufficient to adequately mitigate risks unless supported by internal organisational competence. Accordingly, the appointment of appropriately trained Safety Advisers was identified as a necessary instrument to facilitate compliance and improve risk prevention within undertakings.

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Several structural developments formed the broader policy background to this initiative. These included a sustained increase in the volume of dangerous goods transported within the community, growing regulatory complexity arising from technical and modal-specific rules, and identified gaps in related areas such as occupational health and safety and chemical control regimes. Against this backdrop, the DGSA was conceived as a functional mechanism to support undertakings in addressing competence gaps, reduce accident risks, and facilitate the effective implementation of transport legislation.

The preparatory documents further indicate that the EU legislators drew upon existing national practice. Germany had already introduced a comparable mandatory advisory function through the Gefahrgutbeauftragten-verordnung[1], which entered into force in 1989 and required undertakings involved in the transport of dangerous goods to appoint a qualified Safety Adviser. This national regulatory experience, referenced in the preparatory phase of Directive 96/35/EC, served as an example of established practice demonstrating both feasibility and preventive value, and thus influenced the development of the EU framework.

During the legislative preparatory process, several substantive design choices concerning the scope and nature of the DGSA role were debated. These included, inter alia:

A Whether legal liability should attach to the Safety Adviser personally or remain with the undertaking, with the latter approach ultimately being retained;

B Contemporary commentary during the preparatory phase noted the ambitious expectations placed on the proposed role, observing that "*To do all these things the risk prevention officer would need to be a qualified expert in business management, lawyer, engineer/technician and chemist*".

C "No person may be appointed risk-prevention officer in more than one undertaking" which was removed in the final Directive;

D The initial intention to cover all transport modes, subsequently limited to inland transport as regulated under ADR, RID and ADN; and

E The evolution of the role's designation from the working title "risk prevention officer" in early drafts to the final term "Safety Adviser", reflecting a shift from individual liability towards advisory and preventive functions.

Following the entry into force of Directive 96/35/EC, it became apparent that the effectiveness of the DGSA system was strongly dependent on national implementation. While the directive introduced a harmonised community certificate intended to facilitate mutual recognition, it left substantial discretion to Member States regarding training curricula, examination content, and assessment methods.

Implementation experience revealed that this discretion resulted in significant divergence between Member States. As explicitly acknowledged by the Commission in COM (1998) 174 final, examination standards varied considerably in terms of depth, scope, and methodological rigour.

[1] Nr. 58 Tag der Ausgabe: Bonn, den 19 Dezember 1989 Verordnung über die Bestellung von Gefahrgutbeauftragten und die Schulung der beauftragten Personen in Unternehmen und Betrieben (Gefahrgutbeauftragtenverordnung)

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These discrepancies undermined two central objectives of the original directive: ensuring a uniformly high level of safety across the EU and enabling effective mutual recognition of DGSA certificates within the internal market.

Directive 2000/18/EC, amending Directive 96/35/EC, was adopted as a corrective measure in response to these identified shortcomings. By introducing minimum harmonised requirements for examinations, including mandatory testing components, the amendment sought to reduce disparities in qualification standards and to strengthen the credibility and equivalence of DGSA competence throughout the EU.

A further structural evolution occurred in 2008, when the EU consolidated its regulatory framework for the inland transport of dangerous goods. Directive 2008/68/EC repealed several earlier directives and integrated the relevant safety provisions into a single horizontal instrument. At this stage, the regulatory requirements relating to the DGSA were fully incorporated into ADR, RID and ADN, which were given direct legal effect through EU law. This consolidation reflected the legislator's assessment that maintaining parallel DGSA provisions in separate directives had become redundant and that a unified modal framework provided greater legal clarity and coherence.

The further development of the regulations governing DGSAs is now managed within the Joint RID/ADR/ADN Meeting, convened jointly by the UNECE and the Intergovernmental Organisation for International Carriage by Rail (OTIF). Amendments agreed at the Joint Meeting are subsequently submitted for formal adoption by the competent bodies under UNECE and OTIF and, within the EU, are given binding legal effect through their incorporation into EU law via Directive 2008/68/EC, which explicitly relies on international agreements as the basis for harmonised inland transport regulation.

Notwithstanding this high degree of international harmonisation, Member States retain the possibility, within the limits set by EU law, to introduce national provisions or restrictions related to the organisation, implementation, and supervision of DGSA requirements, as acknowledged in the recitals to the regulations, emphasising subsidiarity, national responsibility for enforcement, and the right to adopt additional safety measures, provided that such measures do not compromise the coherent application of the international rules. As a result, the substantive regulation of the DGSA has evolved from an EU-driven legislative model towards an internationally coordinated, expert-based governance framework.

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The practical application of Dangerous Goods Safety Adviser requirement

DGSA scope and application

The responses indicate that although the requirement is based on a common international framework, its practical application, enforcement structure, and regulatory intensity differ evidently between countries.

The collected data demonstrates significant national variation in how the requirement is implemented across Europe. Differences are evident in the scope of companies covered, the transport modes included, and the existence of quantitative or operational thresholds for exemption.

All countries have ADR and RID in scope of the DGSA Certificate, but a fewer extend it to ADN, IMDG or ICAO.

Administrative implementation also differs considerably. Some countries operate structured systems with mandatory reporting, formal appointment procedures, digital submission platforms, defined annual report templates, and explicit limits on workload or number of companies served. Others rely largely on the core framework in ADR without additional national mechanisms.

Approaches to personal liability, recognition requirements, and supervisory oversight likewise vary, from strong personal accountability regimes to systems were responsibility rests primarily with company management.

The types of operational activity in scope of DGSA (1.8.3.1)

ADR, RID and ADN 1.8.3.1 states which types of activities/operation subject to appoint one or more DGSAs.

“1.8.3.1 Each undertaking, the activities of which include the consigning or the carriage of dangerous goods by ____, or the related packing, loading, filling, or unloading shall appoint …”.

There is a significant difference in the answers from assessed countries, in which type of entities and in relation to the activity, are subject to appointing one or more DGSAs. The questionnaire did not ask why each country had chosen its particular model; therefore, the reasons behind these choices cannot be determined from the responses.

The responses reflect how the requirement is applied and understood in practice and should not necessarily be interpreted as a detailed legal comparison. One of the most significant findings of this study is the lack of reliable and comparable data regarding the implementation and effectiveness of the DGSA framework.

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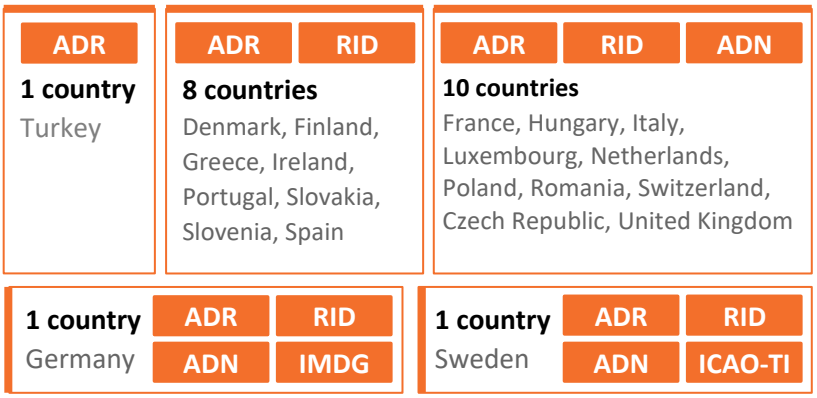
Tabell 1 The types of operational activity in scope of DGSA

Country	a.	b.	c.	d.	e.	f.	g.	h.	i.	j.	k.	l.
Czech Republic	✓		✓	✓	✓	✓	✓					
Denmark	✓	✓	✓	✓	✓	✓	✓	✓	✓			
Finland	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
France	✓	✓	✓		✓	✓	✓	✓		✓		
Germany	✓	✓	✓		✓	✓	✓	✓	✓			
Greece	✓	✓	✓	✓	✓	✓	✓	✓	✓			
Hungary	✓	✓	✓		✓	✓	✓	✓	✓			
Ireland	✓		✓		✓	✓						
Italy	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	
Luxembourg	✓	✓	✓	✓			✓	✓	✓	✓		
Netherlands												✓[1]
Poland	✓	✓	✓	✓	✓	✓	✓	✓			✓	✓[2]
Portugal	✓	✓	✓		✓	✓						✓[3]
Romania	✓	✓	✓	✓	✓	✓	✓	✓	✓			
Slovakia	✓	✓	✓	✓	✓	✓	✓	✓				
Slovenia	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
Spain	✓	✓	✓	✓	✓	✓	✓	✓	✓			
Sweden		✓	✓		✓							
Switzerland	✓	✓	✓	✓	✓	✓		✓				
Turkey	✓		✓		✓	✓	✓	✓				
United Kingdom	✓	✓	✓		✓	✓	✓	✓				

a. The company stated as the "shipper" on the transport agreement but which not physically handing dangerous goods over for transport.
b. The company that physically offers dangerous goods for transport, not stated as the shipper on the transport agreement.
c. Companies that execute the actual transport (movement) of dangerous goods.
d. The Consignee.
e. Companies that load/unload dangerous goods.
f. Companies that pack, mark and label dangerous goods for transport.
g. Tank-container/portable tank operator.
h. Tank-wagon operator (RID).
i. Railway infrastructure manager (RID).
j. Entity in charge of maintenance (ECM) (RID).
k. Reception facility operator (ADN).
l. Others, please specify other type of operations in scope of DGSA requirement.
   1. All involved in the transport of DG. With the exception as mentioned in 1.8.3.1
   2. Entities which deal with load/unload, could also be reception facility, railway infrastructure (RID) manager. Not every RIM and RFO requires DGSA.
   3. Filler

The modal regulations for which you can take the DGSA examination (1.8.3.1)

IASA members were asked which modal regulations you could take the DGSA examination in; this is partly dependent on the various modal regulations nationally implemented and how the national legalisation is structured. Two countries stand out which has a certification scope wider than ADR, RID and ADN, for example Sweden have included IMDG and ICAO-TI (sea and air) which is a result of the implementation model by the act on the transport of dangerous goods.



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Threshold levels that determine whether a company does not require a DGSA (1.8.3.2)

Most responders confirm that the stated exemption in ADR 1.8.3.2 is applied. Some responders also indicate that there are also sector specific exemptions such as within agriculture and construction. Notable is that some responders state that no such DGSA exemption exists or that a specific country regulation is used for when an DGSA is not required.

Tabell 2 Threshold levels that determine whether a company does not require a DGSA

Country	Regulatory exemption	National specific elements
France	According to 1.8.3.2	Additional exemptions in Arrêté TMD exempt few operational activities
Denmark	According to 1.8.3.2	Agriculture/forestry occasional unloading
Italy	According to 1.8.3.2	Annual shipment limits, bulk thresholds (50 t/year), frequency limits
Switzerland	According to 1.8.3.2	Construction site tank containers, less than 1210 litres (1.6.14.4 SDR) Certain prerequisite for UN 2916 and UN 3332.
Ireland	According to 1.8.3.2	Occasional shipments (~1/month) up to 1500 kg/L
Sweden	According to 1.8.3.2	Sectors like agriculture exemptions. Few consignments/year exemptions
Poland	According to 1.8.3.2	Sectors like agriculture may be exempted but every entity must meet defined criteria and must be separately verified
Finland, Hungary Netherlands, Romania, United Kingdom	According to 1.8.3.2	Nothing stated in responses
Slovenia **Spain**	1.1.3.6 and 3.4	
Czech Republic	No criteria established	>50 t/year for RID
Turkey		Explicit annual threshold 20 tons/year DG
Slovakia		No criteria established
Luxembourg		DGSA generally required
Portugal		Annual tonnage ≤ 50 tons/year
Germany **Greece**	Not detailed in response	Not detailed in response

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Additional legal requirements to be recognised as a DGSA or as a company providing DGSA services

Just less than half of the countries respond that there are no additional requirements beyond passing the DGSA examination, while the other half require further administrative actions such as registration, notification to authorities, business permits, or the licensing of DGSA service providers.

NOTIFY OR REGISTER

Denmark
Company notifies the Danish Transport Authority within 30 days of appointment.

Hungary
Separate registration with the authority.

Portugal
Formal communication to the competent authority, with a 5-day deadline.

Sweden
Notify the authority of the DGSA assigned to each company.

Switzerland
Notify the competent cantonal authority.

PERMITS AND BUSINESS STATUS

Luxembourg
Update the business permit to cover DGSA activities.

Poland
External advisers need a registered business covering their advisory services.

Slovakia
DGSA service providers must renew their licence.

Spain
Business permit and specific IAE activity tax requirements.

Turkey
Service providers need a permit or licence from the Ministry.

CERTIFICATE DOCUMENTATION

Luxembourg
The DGSA certificate must be recognised or accepted.

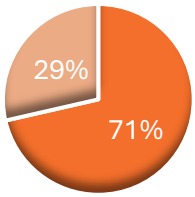
Netherlands
Keep a copy of the certificate within the company and make it available to authorities on first request.

Spain
Send the certificate to the respective authority.

Levels of accountability when practising the DGSA role

Most responders indicate that a DGSA can be held personally accountable under certain legal and contractual conditions. The remaining countries in general state that the responsibility remains with the company and its management.

Countries with some type of consequence	Countries with clear "undertaking accountability"
Germany, Greece, Hungary, Ireland, Luxembourg, Netherlands, Poland, Romania, Slovakia, Slovenia, Spain, Switzerland, Czech Republic, Turkey, United Kingdom	Finland, France, Italy, Portugal, Sweden, Denmark



Limitation to how many companies a DGSA can be responsible for

Only Spain and Turkey, of the 21 respondents indicated that there are formal limits on how many companies a DGSA may serve. The models are either based on a point-based system or a fixed maximum number of companies per individual or consultancy.

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Country specific requirements - Annual dangerous goods report

Among the responses, 10 countries reported specific national requirements or recommendations for the Annual Report, while the others indicated either no special requirements or only non-mandatory guidance.

Similarities across the countries with specific requirements include:

The annual report template/structure

Prescribed / officially published template

9 countries

France · Germany · Hungary · Poland · Portugal · Romania · Spain · United Kingdom · Turkey

Core report content specified

4 countries

France · Germany · Hungary · Spain

Dangerous goods classes, quantities and accidents

Recommended authority template

2 countries

Ireland · United Kingdom

Annual completion / submission deadlines



Specific reporting procedures

Digital reporting

1 country

Spain

Electronic reporting and digital signatures

Submission to authorities

2 countries

Poland · Turkey

Obligation to submit the annual report

Legally defined content structure

3 countries

France · Hungary · Spain

Structure established in annexes or decrees

Legally defined content structure

1 country

Germany

Dangerous goods volumes grouped within the report

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Training and examination



The responses indicate that, while the DGSA role is universally recognised and mutually accepted across Contracting Parties, the pathways to qualification and assessment of competence differ substantially.

Based on responses, most countries acknowledge the DGSA as a key safety function and support cross-border recognition of certificates, enabling mobility and operational flexibility.

However, beneath this shared framework lie major differences in training obligations, entry prerequisites, examination structure, pass marks, examination availability, language policy, and scope of certification.

Some states impose mandatory accredited training, high pass thresholds, multi-component examinations, and strict oversight, while others rely primarily on knowledge demonstration through examination with minimal formal prerequisites.

Examination formats range from short, single-paper tests to full-day assessments incorporating case studies and oral examinations, and pass marks vary from 50% to as high as 90%.

Accessibility also varies markedly. Examination frequency and location range from on-demand or monthly sessions in multiple cities to single annual sittings in one national location, and while digitalisation is emerging, traditional paper-based exams remain dominant.

Language requirements are largely uniform, with examinations exclusively conducted in national languages.

A further divergence appears in whether DGSA certification can be limited to specific classes or substances, reflecting differing national views on whether the role should be generalist or specialist.

Some countries respond that the format for the requalification examination is identical to the initial examination. One main difference is that some include the case study every time whereas others only for the initial examination.

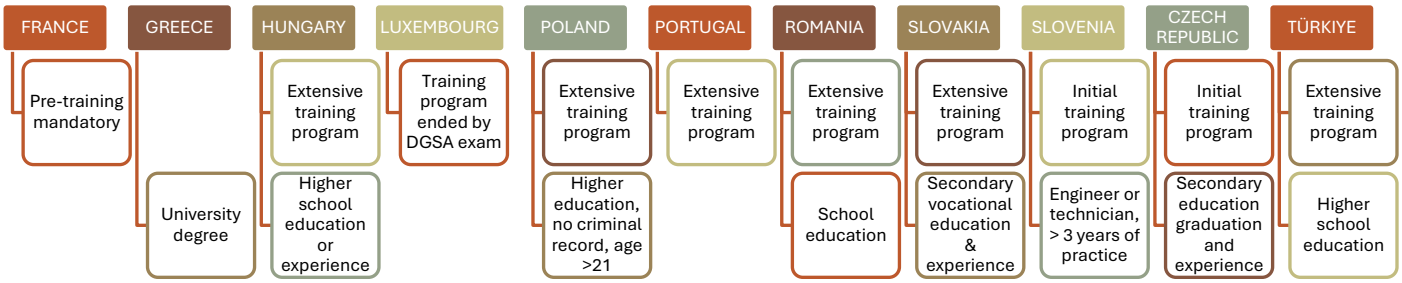
Taken together, the findings underline a central conclusion mutual recognition of certificates does not imply equivalence of qualification standards.

The current system prioritises legal recognition and mobility over uniform assurance of competence, placing greater responsibility on employers, authorities, and DGSA professionals themselves to bridge these differences in practice.

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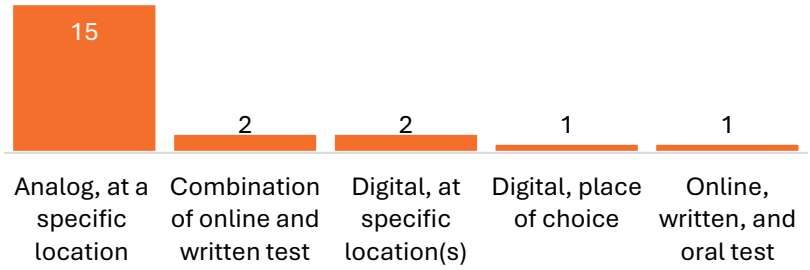
Countries with formal training requirements and educational prerequisites to become a DGSA

The requirement of pre-training ranges from highly structured, mandatory systems to purely examination-based approaches. Half of the responded countries indicate they required formal accredited training with defined hours, content, and oversight prior taking the examination. In contrast, the other responding half relies primarily on demonstration of knowledge through examination, leaving training voluntary or market driven. Several countries applying additional prerequisites focus on educational level and professional suitability, but with notable differences in strictness and scope.



The format of which the DGSA examination is held

Overall, the similarities lie in a continued emphasis on controlled examination environments, while differences reflect varying national readiness to adopt digital or hybrid assessment models.

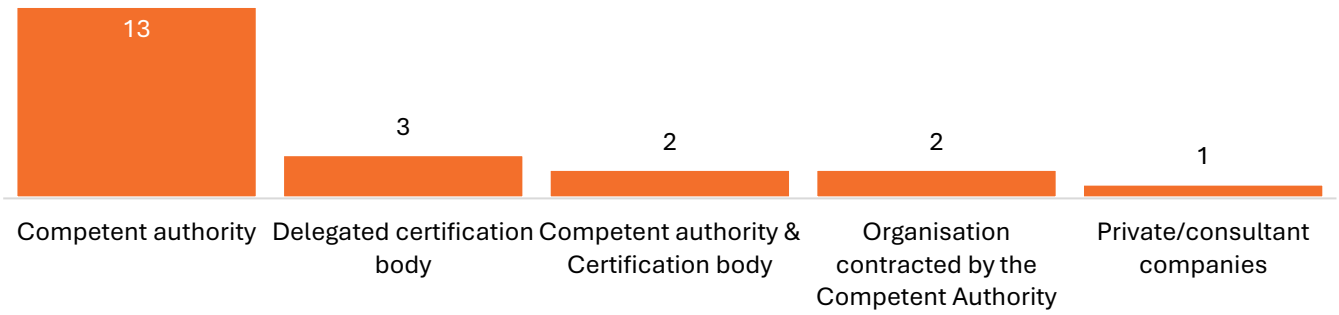


There is a strong predominance of traditional, paper-based examinations. Digitalisation is present but uneven, a small number of countries have introduced supervised digital exams at examination centres while fully remote digital examination is currently exceptional.

Entity that organises the DGSA examination

Overall, the similarity lies in the widespread expectation that examinations be conducted under public authority responsibility. While differences appear mainly in the degree of delegation to recognised, contracted, or private entities rather than in full decentralisation.

The results demonstrate a clear predominance of Competent Authorities (CA) as the examining body and only a smaller number of countries rely on certification bodies or professional institutions.



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DGSA examination, the scope and limitations

Table 3 intend to provide an overview on the responses related to several questions within training and examination. Due to the variation of models in examinations such as number of questions, allowed time etc, the table is only indicative due to the complexity to create a matrix of comparison. To exemplify; some countries have the same time and number of questions for the initial examination while others differentiate between initial and recurrent.

Tabell 3 DGSA Examination, training and limitation matrix

Country	Time initial (I) exam [min]								Time refresh (R) exam [min]							Number of question - Initial									Number of question - Refresh									Case study[2]	Question type[3]	Pass mark	Pre-Training	Reduced Scope	Pre-qualification	Cross-border ops[4]	Exam national language
	General	ADR	RID	ADN	IMDG	ICAO-TI	Case study	Oral test	General	ADR	RID	ADN	IMDG	ICAO-TI	Case study	General	ADR	RID	ADN	IMDG	ICAO-TI	Case study	Oral	Other	General	ADR	RID	ADN	IMDG	ICAO-TI	Case study	Other									
CZECH REPUBLIC	30	90	60				X	15	30	90	60					20	15	15				RID 8	3		20	15	15						I	MCQ | CS = OQ	A: 80–90%, R: 80%	✓	✓	✓	✓	✓
DENMARK	300						X		300							160						X			160								I	OQ + MCQ	60%				✓	✓
FINLAND	120						X		90							50	50	50				15				50	50						I	MCQ	80%		✓		✓	✓
FRANCE		150	45	45			150			150	45	45					50	15	15			X				50	15	15					I	MCQ	MCQ 67% CS 50%	✓		✓	✓	✓
GERMANY		100	50	50	50		X			50	25	25	25				60	30	30	30		X				60	30	30	30				I	OQ + MCQ	50%				✓	✓
GREECE		180	75				90+90			180	75				90+90		50	50				X				50	50						I	OQ + MCQ	60%			✓	✓	✓
HUNGARY	150						120	30	150							20	10	10	10			X	2		20	10	10	10					I	OQ + MCQ	60%	✓	✓	✓	✓	✓
IRELAND	105						120		105						120		9-10					3 x 8				9-10				3 x 8		I + R	OQ + MCQ	65%				✓	✓
ITALY	120	30	30	30			150		120	30	30	30				20	10	10	10			10		10 per spec.	20	10	10	10				10 per spec	I	OQ + MCQ	80%		✓		✓	✓
LUXEMBOURG	Not comparable to others, different setup[5]																																		50%	✓		✓	X	✓
NETHERLANDS		135	135	135			X			135	135	135					30	30	30			2x5 per MoT				40	40	40					I	MCQ | CS = OQ	70%				✓	✓
POLAND	80	60	60	60					80	60	60	60				30	20	20	20			X			30	20	20	20					I	MCQ | CS = OQ	80%			✓	✓	✓
PORTUGAL	60						90		60							40						X			40								I	MCQ | CS = OQ	MCQ 80% CS 70%	✓		✓	✓	✓
ROMANIA	30						120		30							30						10			30								I	MCQ | CS = OQ	70%	✓	✓	✓	✓	✓
SLOVAKIA	90 + 50						120		90 + 50							10 + 50						X			10 + 50								I	MCQ | CS = OQ	80%	✓		✓	✓	✓
SLOVENIA	180						X		120							55						X			28								I	MCQ | CS = OQ	70%	✓		✓	✓	✓
SPAIN	100	50	50				60		60	50	50					50	50	50				10				50	50						I	MCQ | CS = OQ	50%		✓		✓	✓
SWEDEN	480								480							20	20	20		20	20	10			20	20	20		20	20			I	MCQ | CS = OQ	60%				✓	✓
SWITZERLAND	60	60	60				X		60	60	60				X	20	20	20				5			20	20	20				5		I + R	MCQ | CS = OQ	70%		✓		✓	✓
TURKEY	240						X		240							40						X			40								I	MCQ | CS = OQ	70%	✓		✓	X	✓
UNITED KINGDOM	Not comparable to others, different setup[6]																																I + R	OQ	65%				✓	✓

[2] I = Initial | R = Refresh
[3] OQ = Open questions | MCQ = Multiple choice questions
[4] Recognize certificate issued by other EU member state and can act as DGSA without special restrictions
[5] DGSA training and examination part in one and the same
[6] The model consists of Core, Classes, and Modal whereas the Modal also contain case studies. Written answers, no MC questions

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Organisation

This chapter examines how the dangerous goods Safety Adviser (DGSA) function is organised in practice within companies, focusing on structural placement and role design.



The responses illustrate that the organisation of the function is shaped less by a single prescribed model and more by national context, company size, enforcement culture, and practical constraints.

The analysis is based on country responses reflecting practical experience and professional judgement, and in several cases subjective perceptions, rather than verified or empiric data.

Across the responses, the organisational reality of the role emerges as highly pragmatic, and context driven.

The internal DGSA role is commonly combined with other functions such as Health and Safety, Environment (EHS), logistics, quality, or compliance.

The use of external DGSAs, instead of internal, are perceived to be driven by cost considerations for small and mid-size companies, limited scope of dangerous goods activities, access to broader expertise, and the perceived independence of external advisers.

From an interaction perspective, responses indicate that DGSAs generally receive adequate access to company management.

By contrast, perceptions of access and communication with competent authorities are more varied and polarized, with experiences ranging from very positive to clearly insufficient, depending on the country.

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The main reasons companies would choose to use an external DGSA over an internal one

In the early discussions there was an intention that the role should be internal, but that was withdrawn to allow both internal and external DGSAs to accommodate different business needs.

The top 5 reasons why companies would choose to use an external DGSA:

Cost efficiency and reduction

External DGSAs are seen as more economical than employing, training, and maintaining an internal DGSA, especially where DG activities are limited or not full-time.

Small company size and limited scope of DG activities

Small or medium-sized companies, or companies with narrow or occasional DG activities do not justify a full-time internal DGSA role.

Access to broader expertise and experience

External DGSAs are valued for their wider experience across multiple companies, better regulatory knowledge, and higher technical competence.

Independence, objectivity, and credibility

External DGSAs are perceived as more impartial, better able to identify non-compliance, and often taken more seriously by authorities or clients.

Resource constraints and role practicality

Internal DGSAs often perform the role part-time alongside other duties, face time constraints, staff shortages, or lack motivation or capacity to maintain competence.

Common DGSA tasks in practice

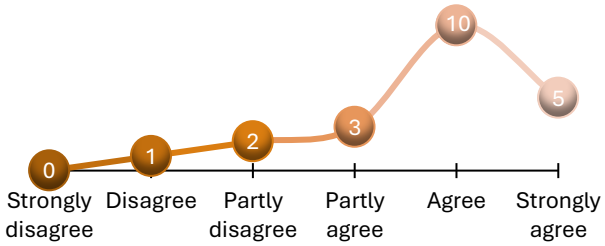
In consideration to what's stated that the DGSA shall at minimum be doing it was asked to get a general understanding of the top 3 tasks that DGSAs are doing in the asked countries. The results showed a high focus on operational support, followed by various training approaches, and that the annual report being the three top main activities.

Advising / consulting on DG compliance and daily operations	Training of employees	Preparing Annual Reports and DG documentation
Advising on compliance	ADR 1.3 training	Annual DGSA report
Answering day-to-day DG questions	Internal DG training sessions	Accident/incident reports
Supporting classification, packaging, documentation, procedures	Raising awareness for staff involved in DG activities	Maintaining DG-related documentation and records.
Troubleshooting and problem solving	Initial and recurrent training	
Operational support		

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DGSA, but not the only responsibility

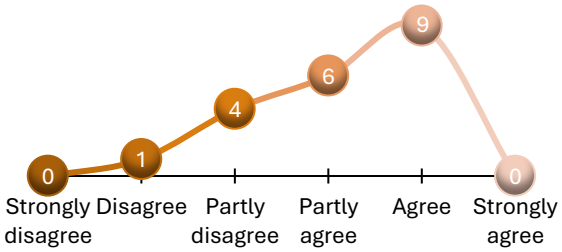
A clear majority of respondents are of the opinion that it is common for DGSAs to hold additional roles alongside their DGSA role, with strong or full agreement expressed by most. Only a small minority are of the opinion that this is uncommon.



Considering the responses to 'The general organisational positions for an internal DGSA and the most common DGSA tasks in practice', several of these roles are scoped adjacent to a responsibility and activity of a DGSA.

Access and communication with management and Competent Authorities

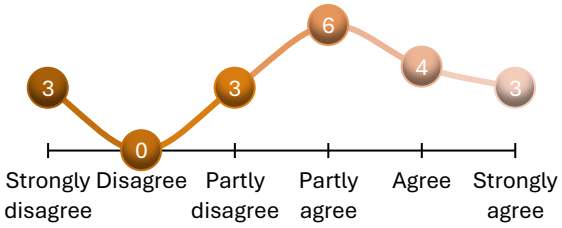
Most respondents indicate adequate access and communication between DGSAs and company management, either fully or partially, while a smaller group report limited access, and only a few express negative views.



While most are of the opinion that there is adequate access, several also responded that they would like to see increased management commitment and strengthening of the DGSA role and its mandate.

20/21 – 1 neutral removed

The view on DGSA access and communication with CA's are mixed, with a substantial share of respondents expressing agreement or partial agreement, while an equally notable group report limited or insufficient access, and a smaller number express neutral positions.



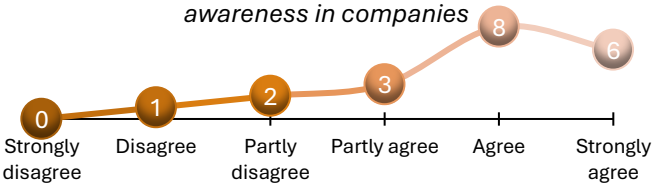
19/21 – 2 neutrals removed

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Effect and benefits

This chapter examines national perceptions regarding the effects and benefits of the DGSA requirement, focusing on three key areas: competence and awareness, accident and incident reduction, and regulatory compliance.

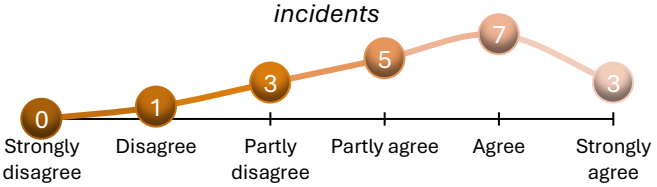
The implementation of DGSA requirement has improved dangerous goods competence and awareness in companies



Across responders, a clear majority perceive that the requirement has contributed positively to improved dangerous goods competence and awareness within companies.

An even larger majority express at least some level of agreement that awareness has increased because of the requirement.

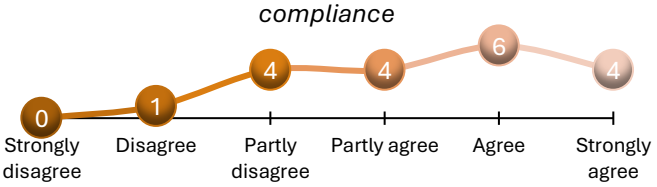
The implementation of DGSA requirement has reduced the dangerous goods accidents or incidents



Regarding the reduction of accidents and incidents, most countries indicate a positive or partly positive impact, although the strength of agreement is more moderate compared to competence and awareness.

Some responses underline that safety outcomes may also be influenced by other regulatory, technical, and organizational developments.

The implementation of DGSA requirement has increased the dangerous goods regulatory compliance



Some variation in responses suggests differing national experiences or perceptions of measurable safety impact.

In relation to regulatory compliance, responses are more divided. While a majority still indicate a positive or partly positive effect, the proportion of neutral and negative responses is higher than for the other two areas.

Notably, only two responders indicate the existence of national research or statistical studies evaluating the DGSAs effects. This indicates that most assessments are based on professional experience and perception rather than formal data analysis.

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Challenges and obstacles

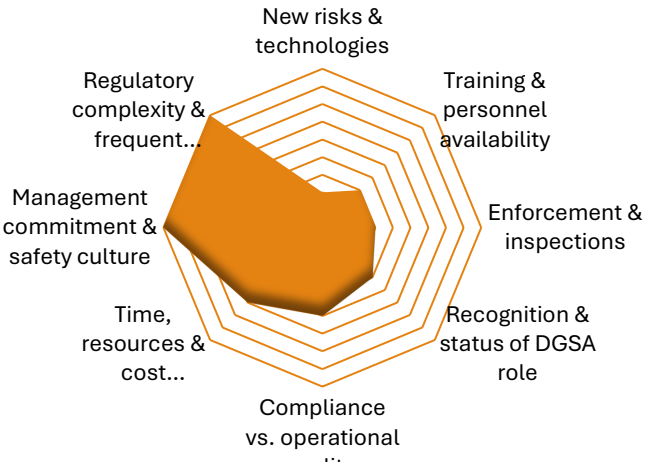
Overall, the responses illustrate that the challenges faced by DGSAs arise not only from regulatory complexity but also from organisational, sector-specific, and behavioural factors that influence how dangerous goods requirements are implemented and applied in practice.

The responses collected across participating countries indicate that DGSAs, and companies, face a range of operational, regulatory and organisational challenges in implementing dangerous goods transport requirements. The most frequently cited issues relate to the increasing complexity and frequency of regulatory changes, the lack of management understanding or commitment to the role, and time and resource constraints.

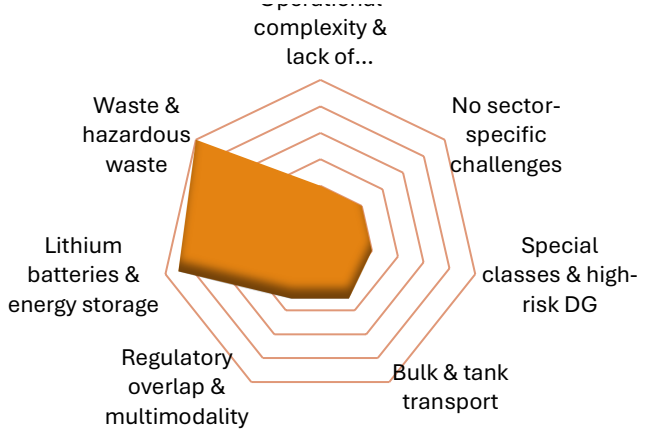
Several respondents also highlight difficulties in ensuring that regulatory requirements are effectively translated into operational practice, particularly in companies with limited safety culture or where compliance is viewed primarily as a formal obligation. Additional concerns include the growing range of regulatory interfaces with other legislation such as environmental or chemical safety rules.

For sector-specific challenges, the most frequently mentioned sectors are waste transport and lithium batteries where complexity increases the advisory burden on DGSAs. These sectors often require specialised knowledge.

Additional remarks from respondents are the challenges in attracting new professionals to the role, the need for more structured competence development beyond certification, and the importance of management attitudes toward safety within organisations.



The most frequently cited challenges for DGSAs relate to management commitment and safety culture, followed closely by regulatory complexity and limited time and resources.



Waste streams and lithium batteries are the most commonly reported sector-specific challenges, while a smaller group of countries report no distinct sector-related issues.

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Summary and conclusions

- The DGSA framework has achieved harmonisation at the level of regulatory principle; however, the findings indicate that the intended level of harmonisation has not been achieved consistently in practical national implementation.

Twenty-five years after introduction, the DGSA requirement is firmly embedded across participating countries and widely perceived as beneficial. However, based on the responses, while the legal framework is harmonised through ADR, RID and ADN, the practical implementation, qualification standards, enforcement intensity, and supervisory practices vary significantly between countries.

While significant differences exist between national qualification systems, the survey does not assess whether these differences result in measurable differences in safety performance or compliance outcomes.

The functions of the DGSA are regulated for ADR, RID and ADN with a few countries that extend to also include IMDG-Code, and ICAO-TI, as well exemptions/thresholds differ considerably. Reliable national statistics on appointed DGSAs and covered companies are largely unavailable. With this diversity, and lack of comparable data reduces the possibility to quantify implication on changes related to dangerous goods regulations and the requirements governing the function.

One of the most significant findings of this study is the lack of reliable and comparable European data regarding the implementation and effectiveness of the DGSA framework.

Training and examination show the greatest divergence. Mandatory training vs. voluntary preparation, pass marks range from 50% to 90%, exam formats ranging from multiple choice questions (MCQ) only to oral + case study, scope limitation allowed in some countries but not in others. Despite this, certificates generally recognised. With consideration to the intention of clarifying and harmonising the examination model in the end of the 1990s, the provided data shows that the expectation on those that want to become a DGSA varies significantly where some countries even require a higher educational degree. In theory the DGSA community could, in theory be seen as a homogenous group but are, in practice, significantly diverse as to what is required to obtain the DGSA certification. Thus, the DGSA training and examination would benefit from a reassessment to find a common model.

It is common, especially for internal DGSAs, that the role is combined with other responsibilities such as EHS or compliance functions. External advisers are perceived to be used mainly from cost-efficiency perspective, most especially for small and mid-size companies. The lack of access to national registers on the number of companies with an assigned DGSA, and the number of DGSAs and other associated data causes the need of assumptions on how the marked model for DGSA is applied.

Access to management is generally perceived positive whereas interaction with authorities is more variable. In several aspects a closer connection and collaboration between the Competent Authorities and the DGSA community would be beneficial for regulatory development; especially in areas of ambiguity and relation to the incidents and accidents prevention.

The DGSA framework remains relevant and broadly supported; the function is a key enabler that supports businesses and governments in ensuring the safe, compliant and consistent handling and movement of dangerous goods. The responses indicate significant differences in implementation and qualification systems, suggesting that practical harmonisation may be less consistent than the common regulatory framework would imply.

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Methodology

- Data collection through MS Forms questionnaire with 59 questions was sent to all members of IASA.
- Downloading and reviewing of historical documents from United Nations Economic Commission for Europe (UNECE) and European Union law (EurLex) related to the development of DGSA regulations.
- Reviewing available literature online and referenced by members as relevant.
- Workshops with assigned persons from IASA to review responses, analysis and draft conclusions.
- Limitations and uncertainties are related to member responses especially where a question could have been misunderstood. Some questions and related responses have not been included as it was evident that the question was misunderstood. Given the time from the collection of responses and publication of this White paper, situations might have changed.

Source material

[1] Directive 96/35/EC

[2] Directive 2000/18/EC, on minimum examination requirements ...

[3] Directive 2008/68/EC on the inland transport of dangerous goods

[4] OJ C 40 17.2.1991 Opinion on the proposal for a Council Directive on the appointment of an officer

[5] OJ C 185, 17.7.1991 Proposal for a Council Directive on the appointment of an officer for the prevention ...

[6] OJ C 185, 17.7.1991 Proposal for a Council Directive on the appointment of an officer..., introductory explanatory section

[7] OJC 233 11.9.1992 Amendment to the proposal for a Council Directive on the appointment...

[8] Agreement concerning the international carriage of Dangerous goods by Road (ADR)

[9] European Agreement concerning the international carriage of Dangerous goods by inland Waterways (ADN)

[10] Regulation concerning the international carriage of Dangerous Goods by Rail (RID), Appendix C to COTIF

[11] Nr. 58 Tag der Ausgabe: Bonn, den 19 Dezember 1989 Verordnung über die Bestellung von Gefahrgutbeauftragten und die Schulung der beauftragten Personen in Unternehmen und Betrieben (Gefahrgutbeauftragtenverordnung)

[12] Safety advisers for the transport of Dangerous Goods: A key to increased safety - 2022 - ISBN: 9789172238701 Ann-Sophie Sellander & Urban Nuldén

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Authors

The creation of this white paper wouldn't been possible without the responses of IASA's member associations that did set aside a lot of time to respond to the extensive questionnaire. Beside the authors, the following associations contributed in various forms to this white paper: BESAA (Belgium); FASID (Denmark); FSA (Finland); ACSTMD and ANCS (France); GGVD (Germany); PSSAMEE (Greece); BTE (Hungary); DGSAAI (Ireland); AES (Italy); ALMD (Luxembourg); VVA (Netherlands); NOFAG (Norway); ESD-ADR and S-DGSA (Poland); APSEI (Portugal); ACS (Romania); the Slovak association of DGSA advisors (Slovakia); ZVS (Slovenia); ACCS, ACONSENA and FEDECOS (Spain); SFGS (Sweden); VSGGB - ASCS - ASAS (Switzerland); ABPZ, z.s. and ADR/RID CSA (the Czech Republic); TMGDK-DER (Turkey); and BADGP (United Kingdom).

The analysis of all the responses and the focus of the paper have been coordinated through a Working Group consisting of the WG Chair Magnus Falk and WG members Les Richings (BADGP, UK), João Cezília (APSEI, PT), Giovanni Adamo (AES, IT), Martin Kints (BESAA, BE), Michèle Bodson (ALMD, LU).

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United Kingdom

Mark Spence has 20 years of experience as a Dangerous Goods Safety Adviser, including extensive experience as an internal adviser for several businesses. For the past six years, he has also operated his own dangerous goods consultancy. Mark served as Chair of the British Association of Dangerous Goods Professionals (BADGP) from 2020 to 2025 and has been President of the International Association of dangerous goods Safety Advisers (IASA) since 2024.

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