



DGSA 25 years later

The IASA member responses on the questionnaire



IASA

International Association of Dangerous Goods Safety Advisers

Introduction



Thank you to all the members that responded to the extensive questionnaire of +60 questions related to the role, training, examination of Dangerous Goods Safety Advisors.

The response rate was impressive, 21 of 23 member countries responded which represent:

- 39 % of the 54 parties ratifying ADR
- 47 % of the 45 parties ratifying RID

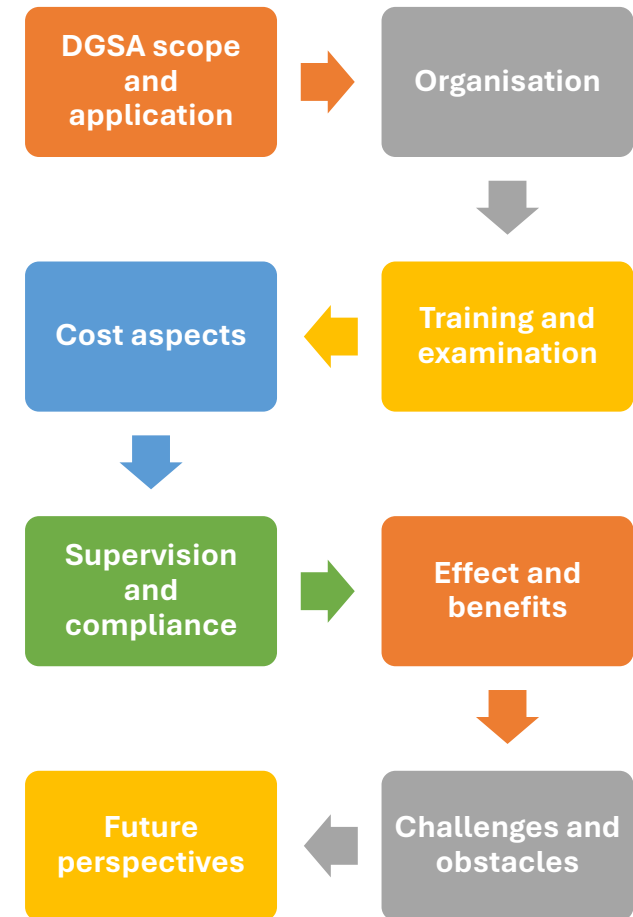
Several of the questions was asked as subjective questions with the purpose to understand each nations opinions; this is supported by the responses on both lack of national data and research.

It can be concluded that the implementation, practical application and challenges differs significant in many aspects across IASA members.

A possible next step would be to decide on a “focus topic” to collect each member association members input for quantifiable purpose; this due to the lack of national research and studies.



Chapters and question flow



Conclusions based on member feedback



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. *[Overall based on all chapters]*

The systems intention is to ensure mutual recognition and harmonisation while the responses shows the opposite.

DGSA are internationally regulated for ADR, RID and ADN with some countries that extend to also include IMDG-Code, and ICAO-TI. Exemptions and thresholds differ considerably. Reliable national statistics on appointed DGSA's and covered companies are largely unavailable. *[Scope and application]*

It is common, especially for internal DGSA's, 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 aspect then especially for small and mid-size companies. Access to management is generally perceived positive; interaction with authorities is more variable. *[Organization]*

Training and examination shows the greatest divergence. Mandatory training vs. voluntary preparation, pass marks range from 50% to 90%, Exam formats ranging from MCQ-only to oral + case study, scope limitation allowed in some countries but not in others. Despite this, certificates are mutually recognised. *[Training and examination]*

Training costs vary widely compared to examination fees. Costs are not widely seen as a compliance barrier. Penalties for non-appointment range from minor administrative fines to substantial financial or criminal sanctions. *[Cost aspects]*

Most countries report supervisory structures, yet inspection frequency and intensity vary. The DGSA role is widely perceived to improve competence and awareness, though few countries have statistical evidence to substantiate the impact *[Supervision and compliance; Effect and benefits]*

The DGSA framework remains relevant and broadly supported. The next phase should shift from legal harmonisation to competence assurance, measurable safety outcomes, and consistent enforcement across contracting states.





DGSA scope and application

How the DGSA requirements apply, to whom, and the exemptions when a DGSA is not required.

DRAFT VERSION PA4



Organisation

To gain an understanding if there is a difference in how companies are using internal and external DGSA's, organizational positions for internal DGSA's, access to management, and the DGSA common tasks.

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Training and examination

The intention to gain an understanding around the requirements for DGSA training and examination. This as it has been identified that there are some differences between countries and would therefore be relevant to understand in more detail. Matters related to cost for training and examination is covered under the section "Cost aspects".

DRAFT VERSION PA4



Cost aspects

The intention with the questions in this section is to gain an understanding around the various cost aspects of DGSA, mainly focusing on training and examination.

DRAFT VERSION PA4



Supervision and compliance

The intention with the questions in this section is to gain a better understanding about how the DGSA requirement is monitored, audited.

DRAFT VERSION PA4



Effect and benefits

The intention with the questions in this section is to gain a better understanding if it can be assumed that the implementation of DGSA has brought any efficiency and benefit related to transport of dangerous goods as initially intended.

The questions are subjective however, if there is research or other evidence it is appreciated if such are referenced. Please refer if the answer is based on perception or data available.

DRAFT VERSION PA4



Challenges and obstacles

The intention with the questions in this section is to gain a better understanding about which challenges companies and DGSA face.

DRAFT VERSION PA4



Future perspectives

The intention with the questions in this section is to be forward looking, what the "world would look like" and changes that should be made to further improve the safe transport of dangerous goods, both nationally and internationally.

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DGSA scope and application

How the DGSA requirement apply, to whom, and the exemptions when a DGSA is not required.

DGSA scope and application, in summary



The responses indicate that although the DGSA 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 Dangerous Goods Safety Adviser (DGSA) 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.

While most countries only have ADR and RID in scope of the DGSA Certificate, fewer extend it to ADN, IMDG or ICAO.

The breadth of actors covered ranges from narrowly defined operational roles to extensive inclusion of infrastructure and specialised entities.

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 ADR framework without additional national mechanisms.

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



Type of operational activity in scope of DGSA



There is a significant difference in which type of entities, in relation to the activity, are subject to appointing one or more DGSA's. The questionnaire did not further ask "why" respective country had chosen their respective model hence not possible to conclude the reasons.

Country	a.	b.	c.	d.	e.	f.	g.	h.	i.	j.	k.	l.
Denmark	✓	✓	✓	✓	✓	✓	✓	✓	✓			
Finland	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
France	✓	✓	✓		✓	✓	✓	✓		✓		
Germany	✓	✓	✓		✓	✓	✓	✓	✓			
Greece	✓	✓	✓	✓	✓	✓	✓	✓	✓			
Hungary	✓	✓	✓		✓	✓	✓	✓	✓			
Ireland	✓		✓		✓	✓						
Italy	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	
Luxembourg	✓	✓	✓	✓			✓	✓	✓	✓		
Netherlands												✓ ¹
Poland	✓	✓	✓	✓	✓	✓	✓	✓			✓	✓ ²
Portugal	✓	✓	✓		✓	✓						✓ ³
Romania	✓	✓	✓	✓	✓	✓	✓	✓	✓			
Slovakia	✓	✓	✓	✓	✓	✓	✓	✓				
Slovenia	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		
Spain	✓	✓	✓	✓	✓	✓	✓	✓	✓			
Sweden		✓	✓		✓							
Switzerland	✓	✓	✓	✓	✓	✓		✓				
The Czech Republic	✓		✓	✓	✓	✓	✓					
Türkiye	✓		✓		✓	✓	✓	✓				
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 1.8.3.2
 2. Entities which deal with load/unload, could also be reception facility (ADN) operator dealing with loading/unloading of DG or railway infrastructure (RID) manager. Not every RIM and RFO requires DGSA.
 3. Filler

The modal regulations for which you can take the DGSA examination



Country	ADR	RID	ADN	IMDG	ICAO-TI
Denmark	✓	✓			
Finland	✓	✓			
France	✓	✓	✓		
Germany	✓	✓	✓	✓	
Greece	✓	✓			
Hungary	✓	✓	✓		
Ireland	✓	✓			
Italy	✓	✓	✓		
Luxembourg	✓	✓	✓		
Netherlands	✓	✓	✓		
Poland	✓	✓	✓		
Portugal	✓	✓			
Romania	✓	✓	✓		
Slovakia	✓	✓			
Slovenia	✓	✓			
Spain	✓	✓			
Sweden	✓	✓		✓	✓
Switzerland	✓	✓	✓		
The Czech Republic	✓	✓	✓		
Türkiye	✓				
United Kingdom	✓	✓	(✓)		



The number of DGSA's and companies with one or more DGSA's assigned



A significant proportion of countries either lack (publicly) available data or provided only estimates rather than confirmed registry figures.

Only three countries reporting figures on companies with DGSA.

There is a clear lack of accessible national statistics on how many companies have appointed at least one DGSA.

The significance in this, is that any changes to the regulations, especially DGSA, would be difficult to quantify.

Country	Registered DGSA's	No. companies with appointed DGSA
Denmark	407	
Finland		
France	~ 6.000	
Germany		
Greece	Data not available. Since 2020 competent authority keeps records of DGSA certifications	
Hungary	1.336	
Ireland	470	
Italy	Data not available estimate 4000	
Luxembourg		
Netherlands		
Poland	1.907	
Portugal	916	1.807
Romania	3.000	
Slovakia	Data not available, estimate 500	
Slovenia	300	
Spain	3.516	34.217
Sweden	552	3.990
Switzerland	Data not available	
The Czech Republic	~ 660	
Türkiye	< 3.000, Passed the exam are automatically registered to the Ministry portal.	
United Kingdom	2.265	

Companies' awareness of the scope, responsibility and purpose of a DGSA

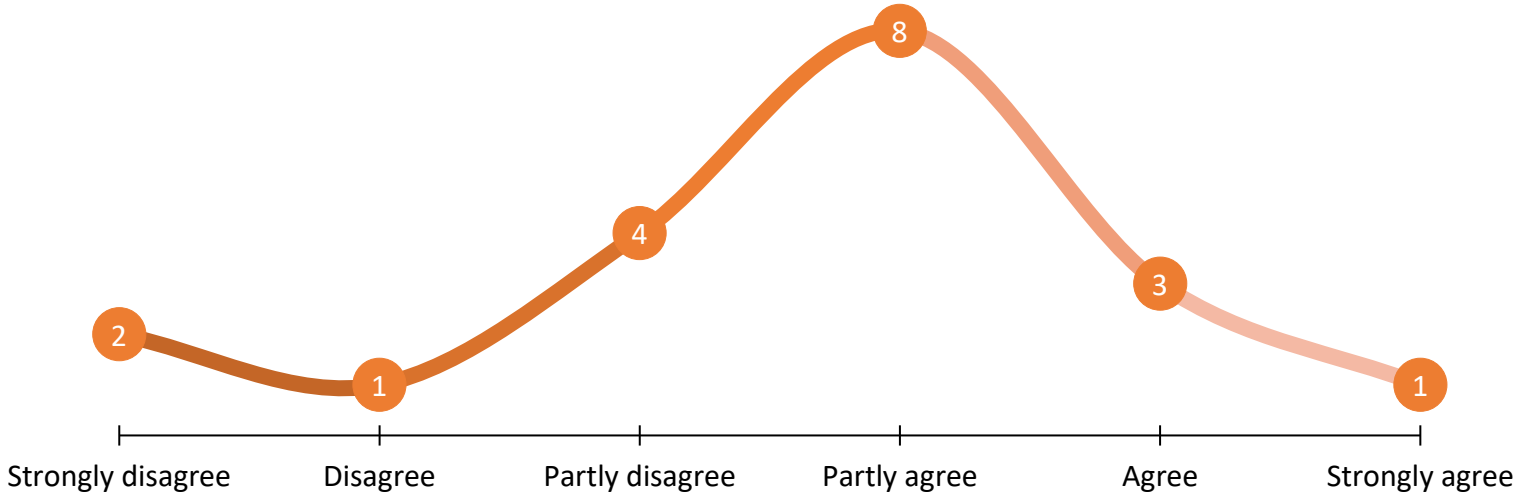


Most respondents express a cautiously positive view that on the perception related companies' awareness about scope, responsibility and purpose of the DGSA.

A significant minority report low or insufficient awareness and only a small number describe the situation as clearly positive.

Two responders did choose a neutral position.

However, comparing with the responses in the chapters “Challenges and obstacles” and “Future perspective” indicate that although positive perception about companies' awareness several express the need of strengthening the DGSA role and mandate.



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



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 exist or that an own model is used for when an DGSA is not required.

Country	Regulatory referenced exemption	National specific elements
Denmark	1.1.3.6, 1.7.1.4, chapters 3.3-3.5	Agriculture/forestry occasional unloading
Finland	1.1.3.6, 1.7.1.4, chapters 3.3-3.5	
France	1.1.3.6, 1.7.1.4, chapters 3.3-3.5	Additional exemptions in Arrêté TMD exempt few operational activities
Germany	Not detailed in response	Not detailed in response
Greece	Not detailed in response	Not detailed in response
Hungary	1.1.3.6, 1.7.1.4, chapters 3.3-3.5	
Ireland	1.1.3.6, 1.7.1.4, chapters 3.3-3.5	Occasional shipments (~1/month) up to 1500 kg/L
Italy	1.1.3.6, 1.7.1.4, chapters 3.3-3.5	Annual shipment limits, bulk thresholds (50 t/year), frequency limits
Luxembourg	None specified	DGSA generally required
Netherlands	1.1.3.6, 1.7.1.4, chapters 3.3-3.5	
Poland	1.1.3.6, 1.7.1.4, chapters 3.3-3.5	Sectors like agriculture may be exempted but every entity must meet defined criteria and must be separately verified
Portugal	1.1.3.6, 1.7.1.4, chapters 3.3-3.5	Exemption if ≤ 50 tons/year
Romania	1.1.3.6, 1.7.1.4, chapters 3.3-3.5	
Slovakia	No criteria established	No criteria established
Slovenia	ADR 1.1.3.6 and 3.4	
Spain	ADR 1.1.3.6 and 3.4	
Sweden	1.1.3.6, 1.7.1.4, chapters 3.3-3.5	Sectors like agriculture exemptions. Few consignments/year exemptions
Switzerland	1.1.3.6, 1.7.1.4, chapters 3.3-3.5	Construction site tank containers, less than 1210 Liters (1.6.14.4 SDR) Certain prerequisite for UN 2916 and UN 3332.
The Czech Republic	No criteria established	>50 t/year for RID
Türkiye	No criteria established	Explicit annual threshold 20 tons/year DG
United Kingdom	1.1.3.6, 1.7.1.4, chapters 3.3-3.5	

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



COUNTRY	ARE THERE ANY THRESHOLD LEVELS THAT DETERMINE WHETHER A COMPANY DOES NOT REQUIRE A DGSA, INCLUDING SECTOR-SPECIFIC EXEMPTIONS?
DENMARK	The requirement for a DGSA does not apply to companies whose activities exclusively concern one or more of the following provisions: 1) Transport of dangerous goods in accordance with subsection 1.1.3.6, exempted by 3.3, 3.4, 3.5 of ADR. 2) Occasional unloading of dangerous goods in agricultural and forestry operations or similar operations.
FINLAND	There are no general quantity or frequency thresholds that automatically exempt a company from appointing a DGSA. A company must appoint a DGSA if it is involved in the transport, packing, loading, filling, or unloading of dangerous goods unless its activities are fully covered by ADR exemptions.
FRANCE	In France, the article 86 of our national regulation (Arrêté TMD) exempt few activities (e.g. Alcoholic beverages into production area, carriage in accordance LQ or partially exemption under 1.1.3.6.)
GERMANY	Yes
GREECE	Yes
HUNGARY	In the case of exemptions, it is not mandatory (e.g., 1.1.3.6, EQ, LQ). In other cases, it is expected regardless of the quantity or frequency delivered. There are no sector-specific exemptions.
IRELAND	Operating below the small load thresholds in 1.1.3.6 and in the case of transport category 3 you are allowed up to 1,500 Kg or L for occasional shipments - approx. 1 per month
ITALY	For all the operators Only shipments in exemption (3.3; 3.4;3.5) without limit Packed shipments: maximum of 24 operations/years, 3 operations/month; within 1.1.3.6 limit Tanks or bulk: only PGIII or transport category 3 or 4; maximum of 12 operations/years, 2 operations/month; within 50 tons per year For the consignee we have two different scenarios: Goods in packages: the final consignee (for whom no further shipment of goods or waste is planned) is always excluded from the appointment of the DGSA, even if the consignee provide itself to the shipment unloading Goods in bulk or in tank: the final consignee is excluded from the appointment of the DGSA only if unloading is entrusted to a third-party company.
LUXEMBOURG	No
NETHERLANDS	The requirement is set in the regulation ADR/RID/ADN. This regulation is the basis of the requirement for appointing a DGSA
POLAND	Yes, the limits are defined in legal acts (i.e.: according to 1.8.3.2 ADR/RID/ADN) Risks and frequency are also defined. There are no "general" sector exemptions (there are some areas/sectors like for example agriculture, where exemptions may usually occur, but every entity must meet defined criteria and must be separately verified).
PORTUGAL	Yes, 1.1.3.6, 1.7.1.4, chapters 3.3-3.5, Exemption if ≤ 50 tons/year
ROMANIA	The exemptions provided for in ADR are also reflected in national legislation as exemptions from the obligation to appoint a Dangerous Goods Safety Advisor.
SLOVAKIA	There are no such criteria established
SLOVENIA	The only levels that can be used are the transport of dangerous goods only according to 1.1.3.6 or 3.4 ADR.
SPAIN	Companies that fall under Partial Exemption 1.1.3.6, Limited Quantity
SWEDEN	Yes There are exemptions from the DGSA requirement, which are based on the exceptions already established in ADR, RID, the IMDG Code, and IATA-DGR.
SWITZERLAND	The following are exempt from the obligation to appoint safety officers: 1. Companies whose activities do not exceed the limited quantities per transport unit or wagon, established by the limit values referred to in number 1.7.1.4, in chapters 3.3–3.5 or, for package transport, in number 1.1.3.6 ADR/RID. 2. Companies whose activities are limited to: a. construction site tank containers referred to in appendix 1, number 1.6.14.4 SDR (means less than 1210 Liters). b. 2 irradiation units UN 2916 with an activity at most 10 times higher than the A2 value (or the A1 value in the case of special radioactive sources) or 2 isotopic probes UN 3332 per transport unit.
THE CZECH REPUBLIC	RID - carriage of more than 50 t/year of dangerous goods - Decree No 1/2000 of Czech Act Coll., on Transport Rules for Public Rail Freight Transport ADR - no limit
TURKIYE	20 tons of dangerous goods annually.
UNITED KINGDOM	Small load exemptions, carriage and consigning of LQ/EQ

Additional legal requirements to 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 licensing of DGSA service providers.

DENMARK	A company must submit information to the Danish Transport Authority no later than 30 days after the appointment of a DGSA. Information must be submitted via digital self-service via www.virk.dk .
HUNGARY	Separate registration at authority is required.
LUXEMBOURG	DGSA Certificates must be recognized/accepted, and Business permit must be updated accordingly
NETHERLANDS	The copy of the certificate must be available within the company. Made available upon first request to the competent authorities.
POLAND	External DGSA that provides advisory business services, a legal form of its activity needed; registered company with scope of services including i.e. advisory, training.
PORTUGAL	There are a legal specific form, defined by the competent authority, and deadline (5 days) for communication to the competent authority
SLOVAKIA	A company that provides DGSA services must prove itself by renewing its license.
SPAIN	Sending the certificate to the respective authority and Business permit plus IAE Specific activity tax
SWEDEN	The DGSA must be reported to the competent authority for the company(ies) he/she is assigned
SWITZERLAND	The DGSA must be reported to the competent authority (Canton).
TÜRKIYE	Companies providing DGSA service are required to get permit/license from the Ministry.



The DGSA's accountability practicing the DGSA role



Most responders indicate that a DGSA can be held personally accountable under certain legal and contractual conditions. At the same time, some state that the responsibility remains with the company and its management.

GERMANY	Fine 250 – 50000 €
GREECE	In case of pollution after the accident then a prosecutor asks for an initial report from DGSA of the company that transported. In case of fatalities in an accident where dangerous goods are implied, then a report from DGSA is asked from the prosecutor to check if ADR is applied. A DGSA is also asked to be present in the court.
HUNGARY	Government Decree 156/2009 (VI.29), Annex 5, Tables 1-5 regulate the matter together with other involved responsible participants who can be held accountable for the commission of the act.
IRELAND	The only offences assigned specifically to the appointed DGSA are failure to produce an annual report or a accident report where applicable and acting as a DGSA without a valid certificate
NETHERLANDS	Although a DGSA works under the responsibility of the management of the company, especially an external DGSA is responsible for advice given. Advice is given however based upon available information. It seldom happened that a DGSA is personally held responsible.
POLAND	Every participant should be responsible for the real and dedicated scope area. The DGSA is however always involved with any proceeding regarding non-compliance with high potential sanctions (risk of withdrawal of the DGSA certificate). Responsibilities depend also on the conditions of the particular contract between the DGSA and the company. However, the main responsibility is on the business management, DGSA is the advice provider.
SLOVAKIA	Usually, each DGSA performs their activities under a contract, which also specifies the penalties for violations or accidents.
SLOVENIA	If the court recognizes the negligence of the DGSA
SPAIN	DGSA is personally liable for violations or accidents in the exercise of their responsibilities
SWITZERLAND	Anyone who, in their role as a DGSA, fails to perform the duties is punishable by a fine
THE CZECH REPUBLIC	Fine; 10000 Czech Crowns
TÜRKIYE	Dangerous Goods Safety Advisers are primarily held responsible for any errors or omissions they may make while performing their duties, under both the regulations of the Ministry of Transport and Infrastructure (administrative) and the Turkish Penal Code (criminal).
UNITED KINGDOM	Dependent on the consequences of the offence that has occurred. Worst case – 2 years' imprisonment, unlimited fine.



Limitation to how many companies a DGSA can be assigned to

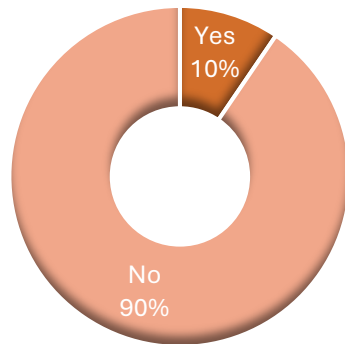
Only two of the 21 respondents indicated that there are formal limits on how many companies a DGSA may serve, based either on a point-based system or a fixed maximum number of companies per individual or consultancy.

Spain

PSICS Security Parameter of the Safety Advisor, this parameter must not exceed 1000 points and is based on the number of people involved in transportation operations

Türkiye

Dangerous Goods Safety Adviser can provide services to a maximum of 4 companies individually, or a maximum of 10 companies within a Dangerous Goods Safety Consultancy firm.



Country specific requirements - annual dangerous goods report



Among the responses, 11 countries reported specific national requirements or recommendations for the annual dangerous goods report, while the others indicated either no special requirements or only non-mandatory guidance.

Similarities across the countries with specific requirements include:

- Use of a prescribed or officially published template for the annual report
France, Germany, Hungary, Poland, Portugal, Romania, Spain, Türkiye
- Specification of core report content, typically covering dangerous goods classes, quantities, and accidents
France, Germany, Hungary, Spain
- Recommended template provided by the competent authority
Ireland, United Kingdom
- Defined annual deadlines for report completion or submission
Poland – 28 February; Portugal – 31 March; Türkiye – end of April.

Distinct or unique national elements mentioned include:

- Mandatory electronic reporting systems and digital signatures (Spain).
- Obligation to submit the report to authorities (Poland, Türkiye),
- Legally binding content structure set out in annexes or decrees (France – Arrêté TMD Appendix IV.4; Hungary – Decree 25/2024 Annex 1; Spain – Order FOM/606/2018).
- Quantitative categorization of dangerous goods volumes within the report (Germany).
- Appendix in ADR (Greece)



Among the responses, 10 reported specific national requirements or recommendations for the annual dangerous goods report.



Country specific requirements - annual dangerous goods report



France	French DGSA must comply with the template of Appendice IV.4 of "Arrêté TMD" for the annual report
Germany	<p>The annual report must contain at least the following information:</p> <ol style="list-style-type: none"> 1. Type of dangerous goods, broken down by class. 2. Total quantity of dangerous goods in one of the following four categories: <ol style="list-style-type: none"> 1. Up to 5 tons. 2. More than 5 tons and up to 50 tons. 3. More than 50 tons and up to 1,000 tons. 4. more than 1,000 tons, 3. Number and type of accidents involving dangerous goods for which an accident report has been prepared in accordance with subsection 1.8.3.6 ADR/RID/ADN, 4. Other information which, in the opinion of the dangerous goods safety advisor, is important for assessing the safety situation, and 5. Information on whether the company has been involved in the transport of dangerous goods in accordance with section 1.10.3 ADR/RID/ADN or 1.4.3
Greece	ADR APPENDIX
Hungary	Annex 1 of Decree 25/2024 (IV.30) specifies the minimum content requirements for the annual report. Submission is not required. (See submitted document, screenshot)
Ireland	<i>Recommended</i> template provided by the competent authority, but it is not mandatory
Poland	The template for the annual report on the transport of dangerous goods is established by regulation by the Minister responsible for transport and should be submitted latest 28th of Feb for prior year to the Voivodship Transport Road Inspection (WITD), the company headquarter geographically refers to.
Portugal	The annual report has a specific template that must be issue until 31st march but is not necessary to submit to the competent authority.
Romania	There is a standard form published by the authority
Spain	There is a program from the Ministry of Transport to carry out the Annual Report of the Safety Advisor. This program has its filters to prevent errors, and the Safety Advisor needs to be registered and have the Digital Signature Certificate. Order FOM/606/2018, of May 25, on the content of the annual report for the transport of dangerous goods by road
Türkiye	The Dangerous Goods Safety Adviser is required to submit an annual report for each business he/she is assigned to the Ministry's online system by the end of April each year. The report has a specific template



Organisation

To gain an understanding if there is a difference in how companies are using internal and external DGSA's, organizational positions for internal DGSA's, access to management, and the DGSA common tasks.

Organisation, in summary



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

The responses illustrate that the organisation of the DGSA 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 DGSA 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 DGSA's 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 DGSA's generally perceive 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.



The main reasons companies would choose to use external DGSA's over internal DGSA



COST EFFICIENCY AND REDUCTION

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

INDEPENDENCE, OBJECTIVITY, AND CREDIBILITY

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

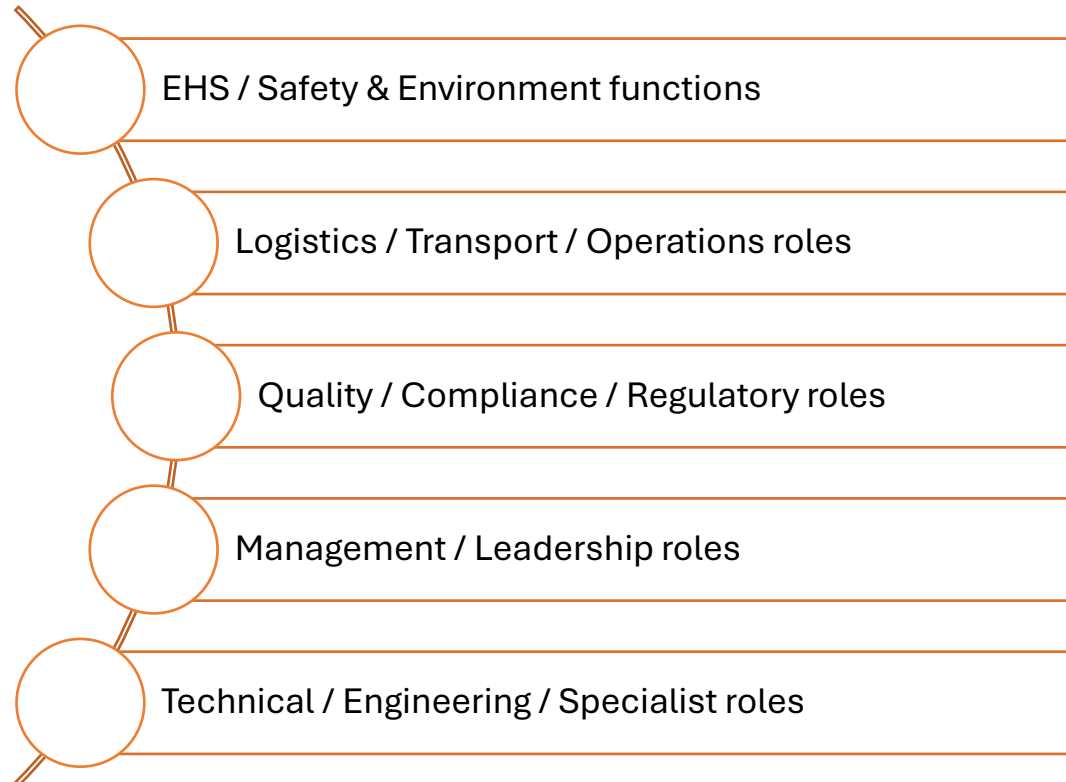
RESOURCE CONSTRAINTS AND ROLE PRACTICALITY

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

The general organizational positions for an internal DGSA and the most common DGSA tasks in practice



Organizational positions for an internal DGSA



Common DGSA tasks in practice

Advising / consulting on DG compliance and daily operations

- Advising on compliance
- Answering day-to-day DG questions
- Supporting classification, packaging, documentation, procedures
- Troubleshooting and problem solving
- Operational support

Training of employees

- ADR 1.3 training
- Internal DG training sessions
- Awareness raising for staff involved in DG activities
- Initial and recurrent training

Preparing annual reports and DG documentation

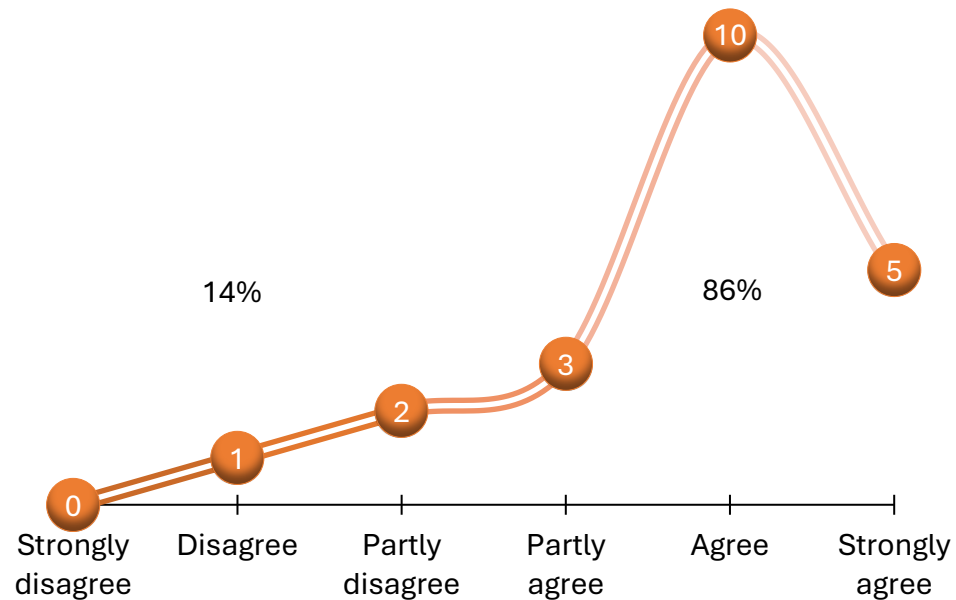
- Annual DGSA report
- Accident/incident reports
- Maintaining DG-related documentation and records

DG Safety advisor, not the only responsibility

A clear majority of respondents are of the opinion that it is common for DGSA's 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.

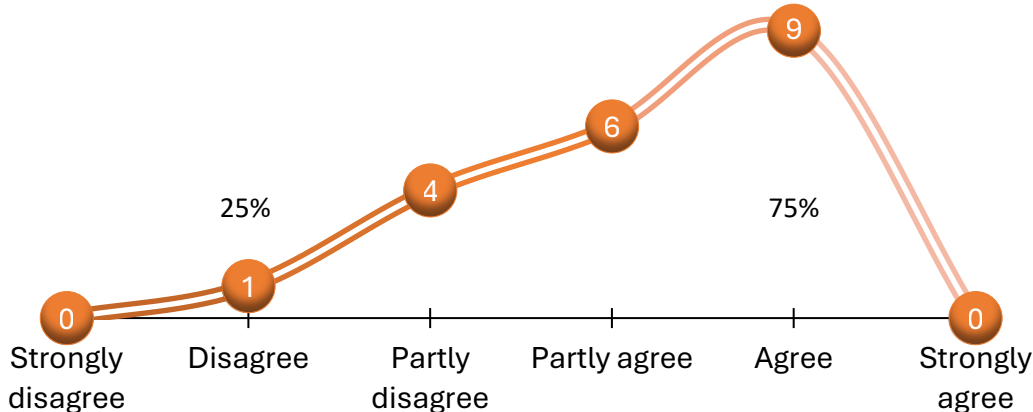
Considering the responses to 'The general organizational positions for an internal DGSA and the most common DGSA tasks in practice', several of these roles are scope adjacent to a responsibility and activity of a DGSA.



Access and communication with management and competent authorities



DGSA’s in your country perceive that they have adequate access and communication with the undertakings management.

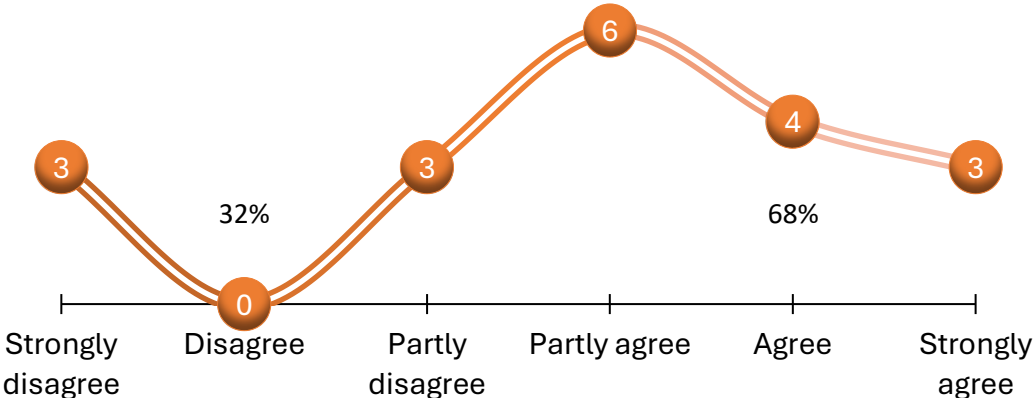


Most respondents indicates adequate access and communication between DGSA’s and company management, either fully or partially, while a smaller group report limited access, and only a few express negative views.

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

DGSA’s in your country perceive that they have adequate access and communication with the competent authorities.



The view on DGSA access and communication with competent authorities 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 neutral removed



Training and examination

The intention to gain an understanding around the requirements for DGSA training and examination. This as it has been identified that there are some differences between countries and would therefore be relevant to understand in more detail. Matters related to cost for training and examination is covered under the section “Cost aspects”.

Training and examination, in summary



This chapter demonstrates that, while the DGSA role is universally recognised and mutually accepted across Contracting Parties, the pathways to qualification and assessment of competence differ substantially at national level.

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 DGSA role should be *generalist* or *specialist*.

Some countries respond that the format for the refresh 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 DGSA 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.



Harmonisation exists in principle and intent, but not in practice.

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



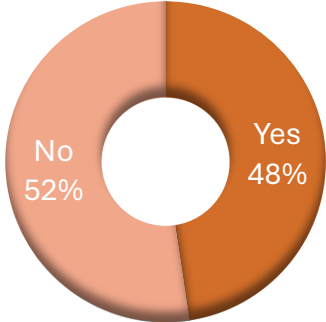
Pre-training ranging from highly structured, mandatory systems to purely examination-based approaches.

Half of the responded countries indicate required formal, accredited training with defined hours, content, and oversight prior taking the DGSA examination.

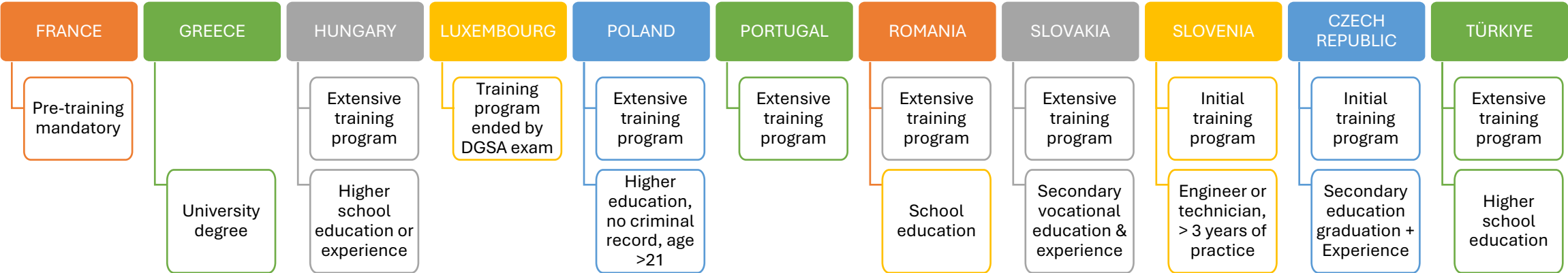
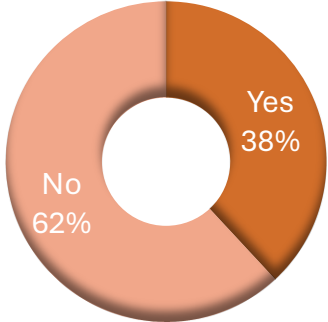
In contrast, the other responding half relies primarily on demonstration of knowledge through examination, leaving training voluntary or market driven.

Several countries applying additional prerequisites focus on educational level and professional suitability, but with notable differences in strictness and scope.

Mandatory pre-training before DGSA examination?



Formal prerequisites in addition required to become a DGSA?



Countries formal training requirements prior taking the DGSA examination



COUNTRY	COMMENT
FRANCE	Mandatory to justify a pre-exam training
HUNGARY	<p>Participation in the training at an accredited training institution is mandatory. The minimum number of training hours is regulated for all types of courses</p> <p>The prerequisites for this course are either a higher education degree plus at least 2 years of experience in the transport of dangerous goods, or high school diploma plus at least 5 years of experience in the transport of dangerous goods or official authority work. For radioactive materials, a minimum basic level radiation protection qualification is required.</p> <p>Additional details:</p> <ul style="list-style-type: none"> • Personal attendance at the training is mandatory. • The training organization must obtain a course organization license from the transport authority, subject to certain conditions. • The basic course consists of 6 training days. • The refresher course consists of 2 training days. • The transport authority conducts random inspections of the training. • A practical element involves processing a case study.
LUXEMBOURG	No pre-knowledge is measured to take part to the DGSA Course. DGSA Training and Examination is one and the same in Luxembourg.
POLAND	<p>DGSA trainings and examinations are organized according to the act on transport of DG.</p> <p>Standard training courses for ADR or RID or AND advisor include 44 training hours. I.e.: Training for a candidate for DGSA of ADR consists of following parts: general (24 hours), specialistic (16h), exercises and consultations (4 hours) = 44hours. If the candidate wants to be trained in an extended area, additional 16 hours are required</p>
PORTUGAL	Specific training recognized by the competent authority with mandatory frequency, minimum of 70 sessions for initial training and minimum of 24 sessions for renewal training (45 minutes per session).
ROMANIA	<p>Prior to taking the DGSA examination, it is mandatory to enrol in a training centre authorized by the Ministry of Transport.</p> <p>Enrolment requirements: valid personal ID and a minimum of 12 years of schooling (secondary education).</p> <p>Mandatory training hours:</p> <ul style="list-style-type: none"> • 18 hours for the basic training • 12 hours for modules 3, 4.1, ... 8, 9 • 12 hours for the radioactive materials module • 6 hours for the explosives module • 6 hours for the gases module • 6 hours for the UN numbers 1203, 1202, 1223, 3475, 1268, 1863 module. <p>When renewing the DGSA certificate, the above training hours are reduced by half (in theory).</p>
SLOVAKIA	<p>The requirement is to complete a 5-day training course at an accredited training centre, the content of which is specified by law and an implementing regulation.</p> <p>After 5 years, the DGSA must complete a refresher training course.</p>
SLOVENIA	For the first certification, attendance at the training is mandatory; for subsequent certifications, it is not mandatory, only an exam. Organizations must meet certain general conditions regarding the venue, time of training and lecturers. Practical elements are not required.
THE CZECH REPUBLIC	<p>ADR – Initial: adult, completing training at an authorized organization (5 days). Refresher: be a holder of a valid certificate of DGSA</p> <p>RID – Initial: adult, completing training at an authorized organization (remote training available, no fixed number of days). Refresher: be a holder of a valid certificate of DGSA</p>
TÜRKIYE	Attending 8 days of training at an accredited training institute, examination at the institute prior to the official DGSA exam, specific requirements and permit requirement for the organizations delivering such training. Quality of training providers is inspected frequently by the Ministry

Countries with formal prerequisites, in addition to pass the DGSA examination, required to become a DGSA

Country	Are there any formal prerequisites, such as educational level, professional background, prior experience etc., in addition to pass the DGSA examination required to become a DGSA?
Greece	University degree
Hungary	<p>The prerequisites for this course are either a higher education degree plus at least 2 years of experience in the transport of dangerous goods, or high school diploma plus at least 5 years of experience in the transport of dangerous goods or official authority work. For radioactive materials, a minimum basic level radiation protection qualification is required.</p> <p>After passing the DGSA exam, the DGSA must submit a request for inclusion in the Official Registry. Once the registration is completed, the consultant's name is entered into the registry, allowing them to responsibly perform the DGSA duties in practice.</p>
Poland	Higher education, lack of criminal record (no convictions for intentional crimes against document reliability, economic turnover, or public safety), age of at least 21 years, document confirming completion of training for the DGSA candidate, exam fee payment to be introduced with the application for exam together.
Romania	12 years of schooling
Slovakia	Applicants must have at least a secondary vocational education and experience in the field.
Slovenia	The formal requirement is at least a 6th level of education (engineer) or a 5th level (technician) with at least three years of practice.
The Czech Republic	<p>ADR – completed secondary education (graduation)</p> <p>RID – completed secondary education (graduation), confirmation of experience in the field of handling dangerous goods for at least 5 years, document on medical fitness.</p>
Türkiye	The prerequisites for taking the DGSA exam in Türkiye are as follows: holding a bachelor's degree, not having been convicted of crimes such as smuggling, fraud, or breach of trust, and having completed 64 hours of DGSA training (theoretical training + practical application) from training institutions authorized by the Ministry.

The annual availability of examination dates and examination location availability



Countries ensure at least annual access to the DGSA examination, the ease of entry and scheduling flexibility for candidates differs substantially.

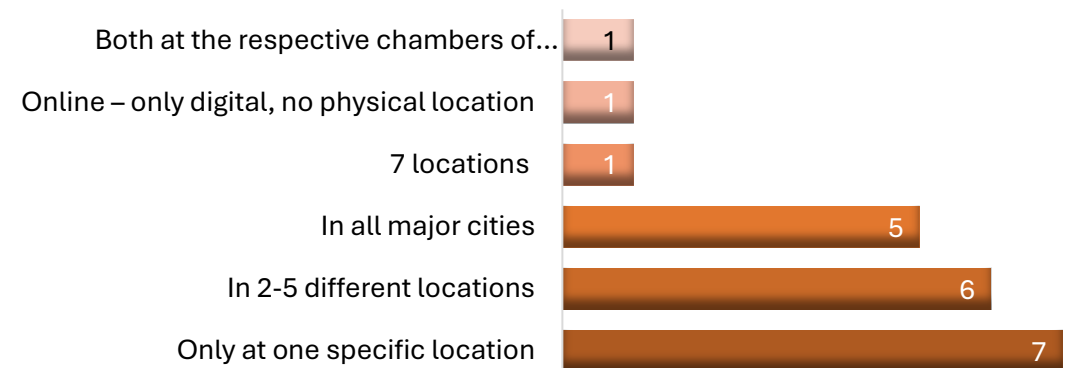
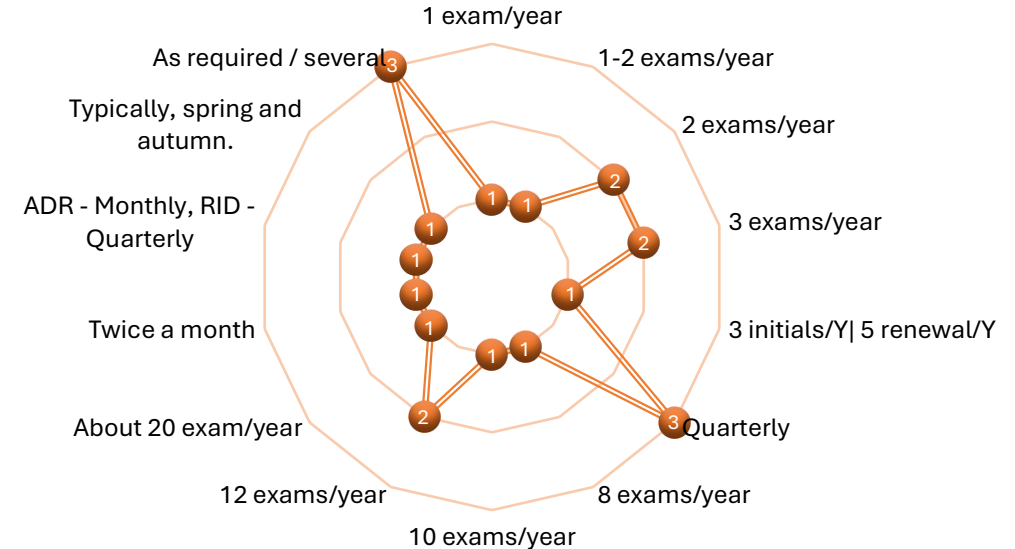
The responses shows wide variation in examination availability across countries.

- A first group offers high or flexible availability, either through monthly or more frequent sessions or fully demand-driven systems.
- A second group provides moderate, predictable access, typically quarterly or 3–4 times per year.
- A smaller group has very limited access, with exams offered only once or twice per year.

Accessibility varies with location strategy reflecting national choices between centralisation, regionalisation, and digitalisation

- Several countries offer broad geographic access, either through examinations in all major cities or via numerous regional centres.
- A second group provides limited but distributed access, typically through 2–5 locations nationwide
- In contrast, a third group concentrates examinations in a single national location.

France represents a distinct digital model, offering exams exclusively online, effectively eliminating location constraints altogether.



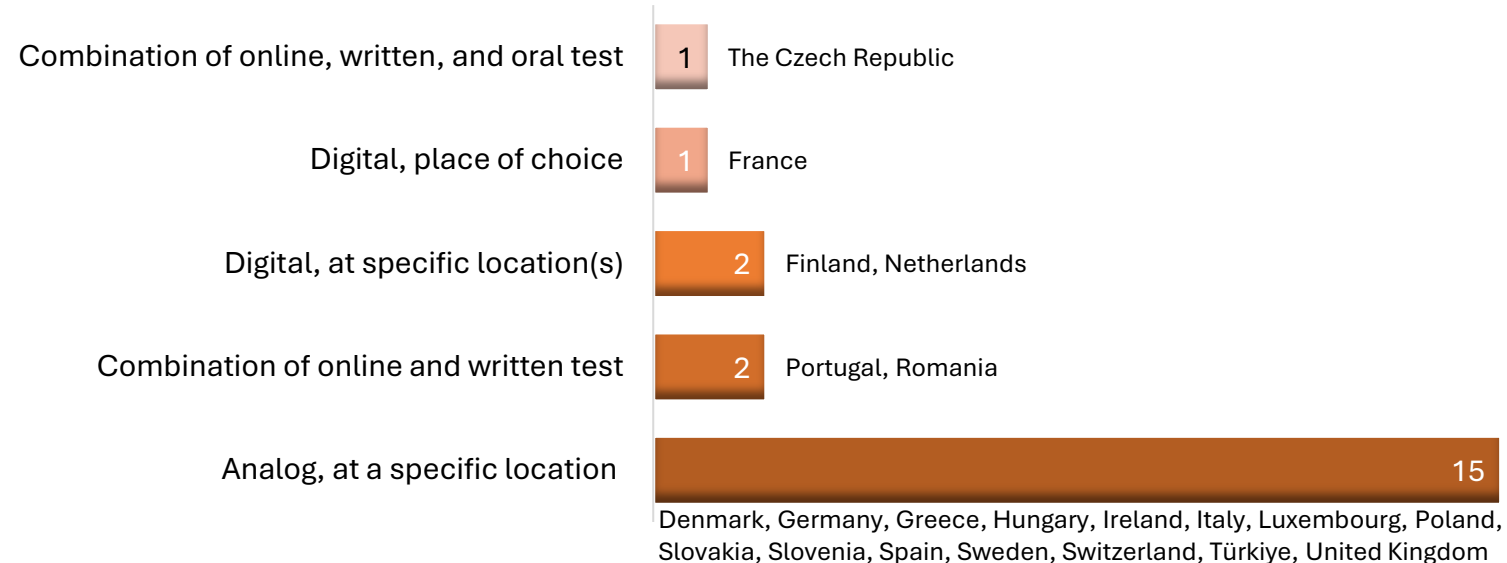
The annual availability of examination dates and examination location availability

COUNTRY	ANNUAL AVAILABILITY OF EXAMINATION	EXAMINATION LOCATIONS
FINLAND	As many as you want! those are individual tests	In all major cities
FRANCE	3 exams per year for the initials. 5 renewal exams	Online – only digital, no physical location
GERMANY	As required	Both at the respective chambers of commerce and industry and at the training company
GREECE	3 exams annually	In only 1 specific location
HUNGARY	Typically, applications examinations can be submitted in spring and autumn.	In 2-5 different locations
IRELAND	3 per year	In 2-5 different locations
ITALY	At least 2 dates for year, for each provincial motor vehicle registration office	In all major cities
LUXEMBOURG	Usually once a year, max. 2	In only 1 specific location
NETHERLANDS	The organisation that is a recognised body (CBR/CCV) to prepare and conduct examination has a very broad calendar on dates and hours	In all major cities
POLAND	Approximately 2 times per month except of summer holiday season. About 20 exam sessions in a year	In only 1 specific location
PORTUGAL	Once a month.	In 2-5 different locations
ROMANIA	Once per month, per shift.	In only 1 specific location There is one examination centre located in each county
SLOVAKIA	We have four accredited entities and exams are offered approximately eight times a year.	In 2-5 different locations
SLOVENIA	Exams can be taken approximately every 3 months; 2 providers for DGSA	In 2-5 different locations
SPAIN	Usually once a year	In all major cities
SWEDEN	Approximately 10 times per year	In only 1 specific location
SWITZERLAND	Probably twice a month	In all major cities
THE CZECH REPUBLIC	ADR - once per month, RID - on a quarterly basis	In only 1 specific location
TÜRKIYE	Usually once a quarter	In 2-5 different locations
UNITED KINGDOM	Once a quarter	7 locations to provide appropriate geographic access

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.

- A strong predominance of traditional, paper-based examinations,
- Most countries still relying on paper-based examinations conducted at specific locations.
- 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 organize the DGSA examination



Overall, the similarity lies in the widespread expectation that DGSA 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 as the examining body.
- A smaller number of countries rely on certification bodies or professional institutions,
- Purely private-sector examination models are rare.
- Some countries apply mixed arrangements, differentiating between ADR and RID or combining public and academic bodies.



What is the pass/fail rate of the examination?



PAGE TO BE REMOVED

This question was
phrased
wrong hence
the responses cannot be used

The DGSA examination – overview matrix



COUNTRY	TIME INITIAL (I) EXAM [min]								TIME REFRESH (R) EXAM [min]								NUMBER OF QUESTION - INITIAL								NUMBER OF QUESTION - REFRESH								CASE STUDY	QUESTION TYPES	PASS MARK	PRE-TRAINING	REDUCED SCOPE	PRE-QUALIFICATION	CROSS-BOARDER OPS	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																																			
DENMARK	300					X		300								160								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							50	15	15				I	MCQ	MCQ 67% CS 50%	✓		✓	✓	✓																														
GERMANY		100	50	50	50			50	25	25	25				60	30	30	30			-			60	30	30	30			I	OQ + MCQ	50%				✓	✓																														
GREECE		180	75			90 + 90		180	75				90 + 90		50	50								50	50						OQ + MCQ	60%			✓	✓	✓																														
HUNGARY	150					120	30	150							20	10	10	10			?	2									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																																																												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		60		80	60	60	60			30	20	20	20						30	20	20	20				I	MCQ CS = OQ	80%				✓	✓	✓	✓																												
PORTUGAL	60					90		60						40									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									10+ 50							I	MCQ CS = OQ	80%	✓		✓	✓	✓	✓																													
SLOVENIA	180							120						55									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	ADR & RID 70%	✓		✓	✓	✓	✓																														
THE CZECH REPUBLIC	30	90	60				15	30	90	60				20	15	15			RID - 8	3			20	15	15				I	MCQ CS = OQ	A: 80–90%, R: 80%	✓	✓	✓	✓	✓	✓																														
TÜRKIYE	240							240							40									40								MCQ	70%	✓		✓		X	✓																												
UNITED KINGDOM	Not comparable to others, different setup																																																					I & R	OQ	65%					✓	✓					

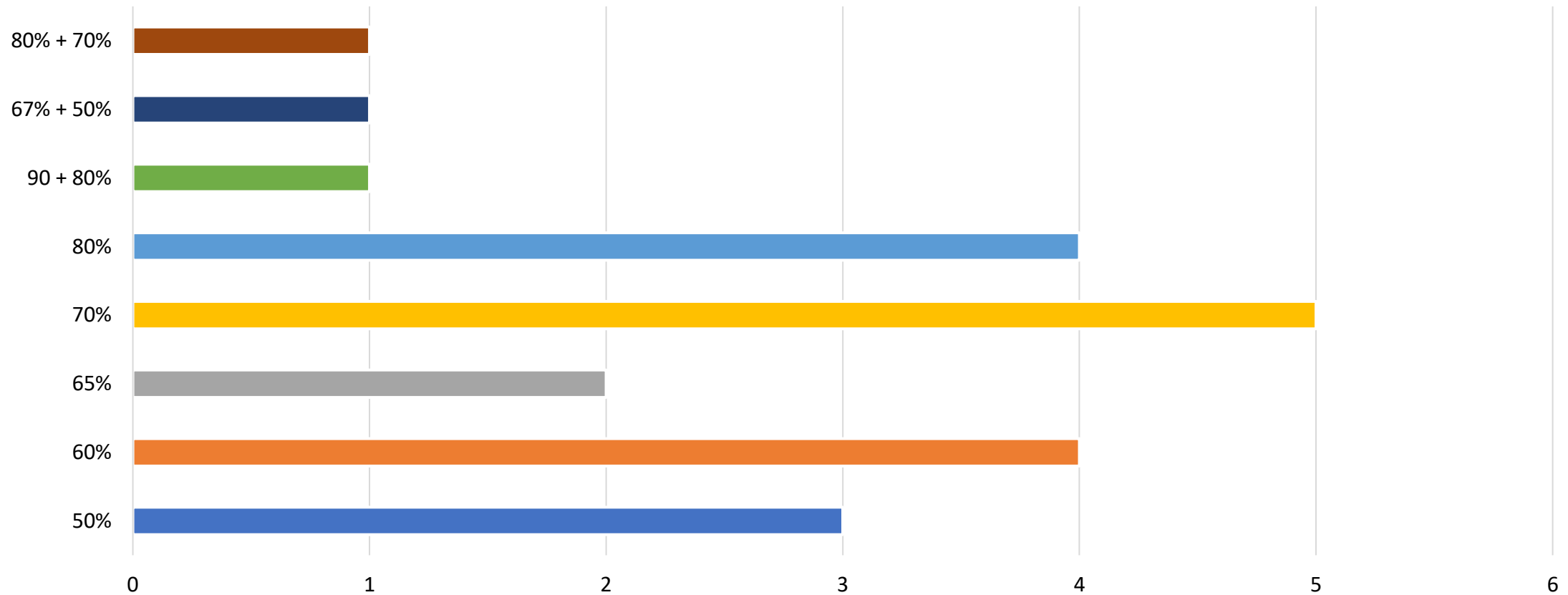
29. Is it possible to limit the scope of the DGSA examination to, for example, only apply to flammable liquids?
 30. Can a DGSA certified in another country work in your country without fulfilling additional requirements?

Country	DGSA Scope limitation?	Cross-border ops.
Denmark	No	Yes
Finland	Class combination	Yes
France	No	Yes
Germany	No	Yes
Greece	No	-
Hungary	Request based	Being listed in the Official Registry is a prerequisite.
Ireland	No	Yes
Italy	Petroleum products	Yes
Luxembourg	No	Certificate must be recognized and Case in Luxembourg, the company for whom that person is working for has to be registered in Luxembourg
Netherlands	No	Yes
Poland	No	Yes
Portugal	No	Yes
Romania	Petroleum products	Yes
Slovakia	No	Yes
Slovenia	No	Yes
Spain	Class combination	Yes
Sweden	No	Yes
Switzerland	Class 1, 2, 7 and petroleum products	But this is restricted to DGSA's from the EEA and Switzerland
The Czech Republic	Class combination	Yes
Türkiye	No	A DGSA certified in another country must submit it to the Ministry for approval to be able to work in Türkiye.
United Kingdom	No	Yes

25. What is the pass mark (%) to pass the exam?

~~26. What is the pass/fail rate of the examination (approximate statistics if available)?~~

25. What is the pass mark (%) to pass the exam?





Cost aspects

The intention with the questions in this section is to gain an understanding around the various cost aspects of DGSA, mainly focusing on training and examination.

Cost, in summary

Taken together, the cost data indicates that DGSA-related costs are shaped more by national regulatory structures, training market design, and enforcement frameworks than by examination fees alone.

While costs are unevenly distributed across countries, the dataset highlights the importance of distinguishing between different cost components such as training, examination, compliance, and infringement-related costs, when interpreting national figures.

This chapter therefore covers direct costs, perceived economic impacts, and costs linked to non-compliance.

Examination fees are generally low to moderate in most countries and represent a minor cost element on their own.

Training costs constitute the largest and most variable cost component of DGSA qualification. Most countries cluster within a mid-range cost band, while a smaller number exhibit either very low costs or notably higher costs driven by multi-modal scope, course duration, or market structure.

Perception-based responses indicate that DGSA costs are not widely viewed as a prohibitive barrier to compliance, although some respondents highlight context-dependent impacts, particularly for smaller companies or organisations with limited dangerous goods activities.

Cross-border training or examination is generally not pursued as a cost-reduction strategy, suggesting that factors such as language, national recognition, administrative alignment, and market expectations outweigh potential financial savings.

Costs of non-compliance vary substantially, ranging from modest administrative fines to high financial penalties, escalating sanctions, and criminal liability in some jurisdictions.

In several cases, indirect and cumulative costs such as additional findings during inspections or repeat-offence escalation may significantly exceed the initial fine.

Additional remarks from respondents underline that cost impacts are often influenced by company size, enforcement practices, and legal interpretation, and that some cost elements cannot be fully captured through fixed figures alone.



It is difficult to compare cost between countries due to differences in financial and market prerequisites

The variation in prices for the DGSA examination

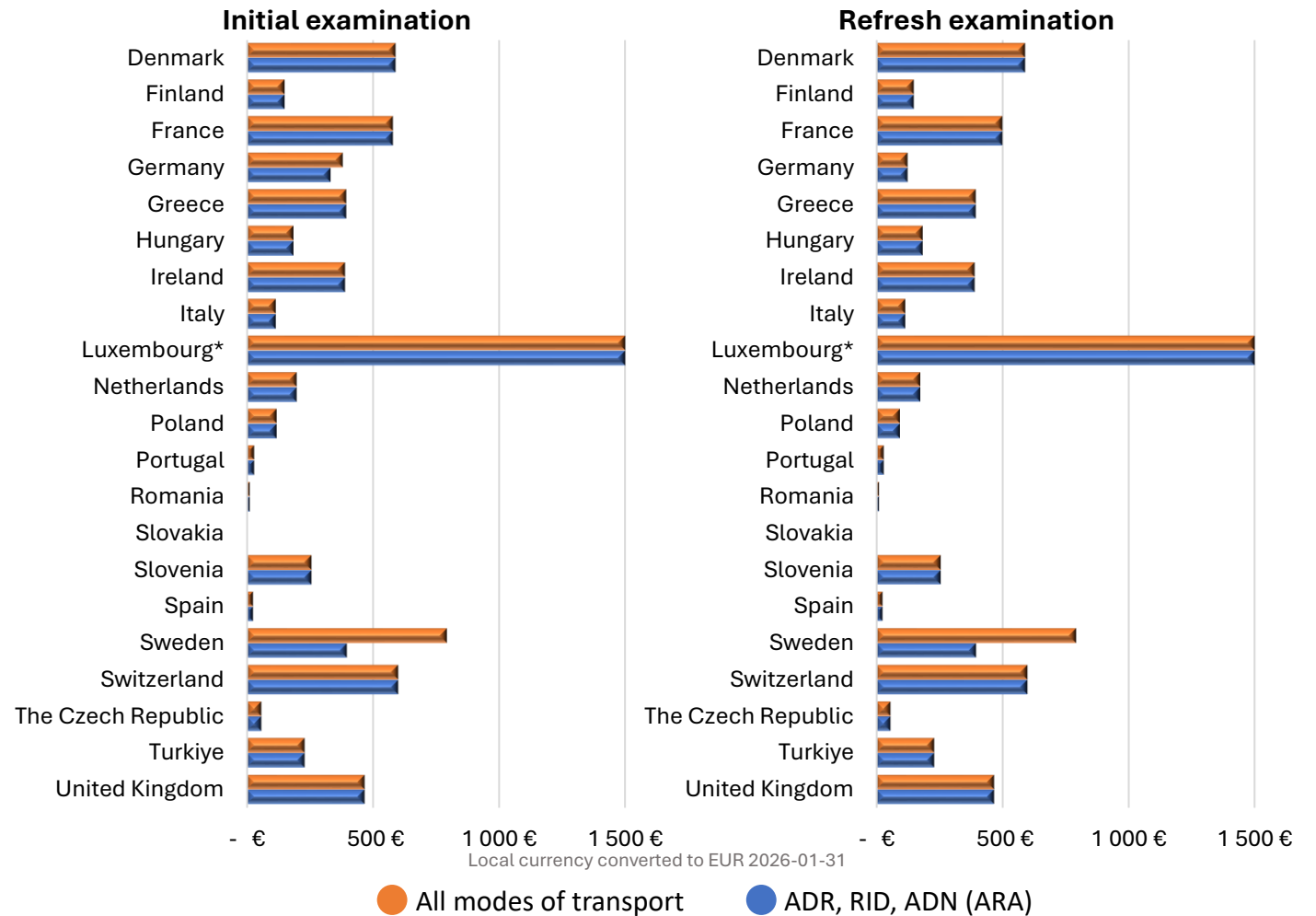


DGSA examination cost differences do not on their own indicate higher compliance costs, but rather different national approaches to financing training, certification, and administration.

- The apparent extreme differences in DGSA examination costs are partly explained by national system design rather than exam pricing alone.
- Luxembourg stands out with a high total cost because they bundle mandatory training and examination into a single price.
- Pure examination fees in most countries remain modest, commonly falling in the €25–€400 range.
- The cost comparisons without structural context risk being misleading.

Important to consider, due to the difference in setup, some countries have identical prerequisite for initial and refresher whereas others have a different setup for the refresh examinations

Cost data provided are in some instances not differentiated per mode of transportation, rather provided as “one price”.
For comparison purpose it is assumed that those with “one price” cover ADR, RID and ADN (ARA).



Estimated average cost for training prior taking a DGSA examination



The responses show that DGSA pre-examination training costs vary significantly.

Luxembourg bundles mandatory training and examination into a single price hence not fully comparable unless the total cost is summarized, yet dependent on examination scope.

Training cost for Sweden has been reduced to the estimated cost for ADR and RID to enable comparison with others as Sweden also have IMDG and ICAO-TI as part of the DGSA examination.

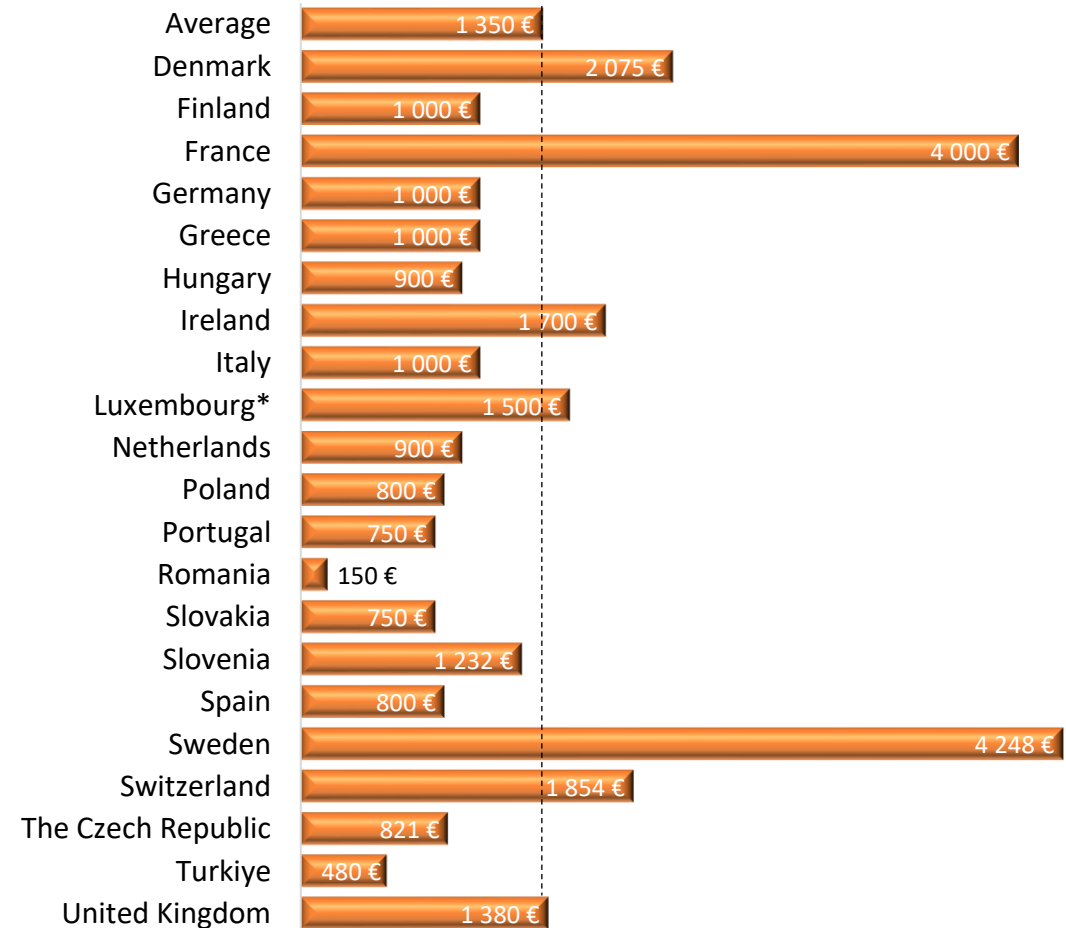
Unlike examination fees, training represents the dominant cost component of DGSA qualification.

The wide dispersion suggests that access to the DGSA profession is influenced more by training market structures than by regulatory examination costs.

While higher costs may reflect broader competence development, they may also act as entry barriers, particularly in multi-modal or smaller national markets.

For comparative and policy analysis, it is essential to clearly distinguish training costs from examination fees and to document what is included in reported training prices.

This finding supports the broader conclusion that DGSA cost comparability across countries requires structural context, not headline figures alone.



Local currency converted to EUR 2026-01-31

If cost is perceived as a barrier and an appetite to pursue cross-border training for cost reduction purpose



Is cost a barrier?

The subjective responses suggest that DGSA costs are rarely viewed as a prohibitive barrier.

Although, some countries either partly agree and agree that the cost could be a barrier.

The questionnaire did not ask for an elaboration to the stated opinion; therefore, it is difficult to draw conclusions to why 25% are of the opinion it is seen as a barrier.

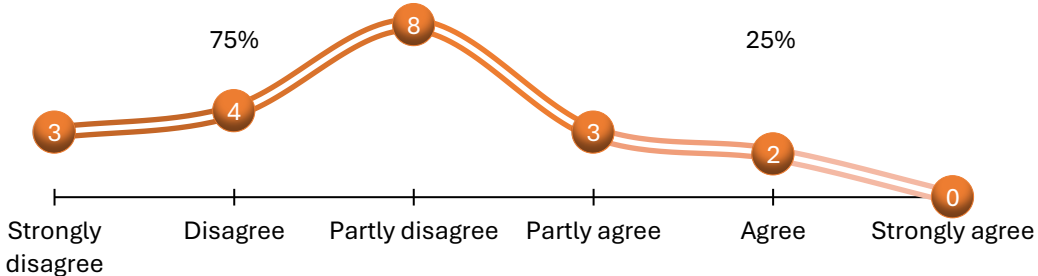
The DGSA examination rather done in another country due to lower cost?

The responses show a very strong consensus that DGSA training and examinations are generally not undertaken in other countries as a cost-saving measure.

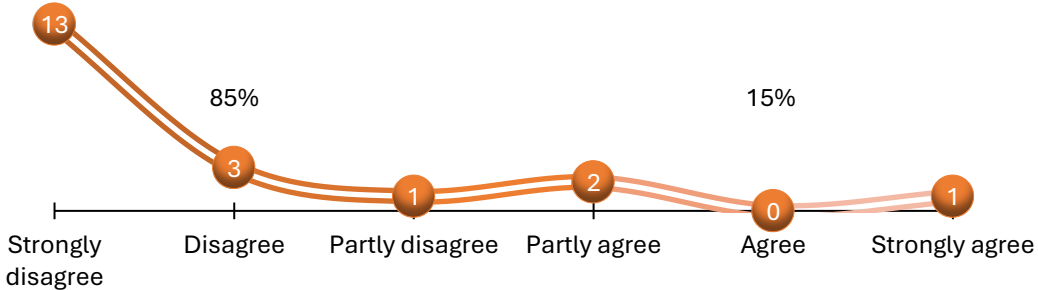
Cross-border “cost shopping” for DGSA qualification appears to be exceptional rather than systemic.

Overall, the subjective responses indicate that national DGSA training and examination systems remain largely self-contained, and that cost differentials alone are insufficient to trigger cross-border qualification behaviour.

The cost for DGSA is considered a barrier for companies to comply with the DGSA requirement



The training and examination is rather done in another country due to the national cost for training and examination.



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The “cost” for a company if found not have one or more DGSA appointed



The “cost” of not appointing a DGSA ranges from modest administrative fines to very high financial penalties and, in some jurisdictions, criminal liability.

While some countries define low or unspecified fines, others apply scalable, repeat-offence, or outcome-dependent sanctions, resulting in substantial variability in potential exposure for companies subject to DGSA requirements.

Direct financial penalties

- *Low fixed penalties*

Several countries apply relatively low, fixed fines, typically between €500 and €1,500. These sanctions are clearly defined but limited in monetary impact.

- *Medium-level fines*

Some countries apply fines that are noticeably higher and may be compounded by additional administrative penalties.

- *High or wide-range fines*

Other countries apply substantially higher penalties or wide ranges.

Escalation and legal consequences

- Some countries explicitly link repeat infringements to increased fines or legal action.
- Custodial sanctions are mentioned in France and the United Kingdom.
- In Sweden, sanctions depend on whether the absence of a DGSA is connected to an incident or accident, indicating an outcome-based approach.

Indirect cost exposure

Some responses highlight that the absence of a DGSA may trigger additional consequences

COUNTRY	RESPONSE
DENMARK	1.340 €
FRANCE	Fines of 30,000€ and 1 year of imprisonment
GERMANY	5.000 – 50.000 €
GREECE	1500 €
HUNGARY	1200 €
IRELAND	500 €
ITALY	From 6000 € to 36000 €
LUXEMBOURG	No data available
NETHERLANDS	Legal fine as economic offence, this is set at €1.900. Annual report not available fine as economic offence of €900. All offences are considered economic offences and result in specific fines set by government. These fines are “first offender” fines. Second or third offence means an increase in fine. Fourth offence means a lawsuit.
POLAND	There is a penalty-fee (5000pln) imposed on the entity as direct consequence sanction. However, there is also a risk of higher costs, because of other potentially recognized non-conformities in scope of particular DG regulations.
PORTUGAL	It depends on the number of employees. <10: 1700€-3000€; 10-50: 4000€-8000€; 50-250: 8000€-16000€; >250: 12000€-24000€
ROMANIA	500 €
SLOVAKIA	There are no specified fines for companies that do not have a DGSA appointed.
SLOVENIA	Often just a warning, and then a fine of about 4,000 EUR.
SPAIN	4001 €
SWEDEN	Fines/corporate fines/injunctions – different, depending on whether it is linked to an incident/accident
SWITZERLAND	No data available
THE CZECH REPUBLIC	ADR - up to 750,000.00 Czech Crowns; RID - up do 1,000,000.00 Czech Crowns
TÜRKIYE	500 €
UNITED KINGDOM	Serious breaches would lead to unlimited fines and 2 years in prison where a person was killed.



Supervision and compliance

The intention with the questions in this section is to gain a better understanding about how the DGSA requirement is monitored, audited.

Supervision and compliance, in summary



The supervision mechanisms are widely established, generally regarded as important, but in several countries perceived as insufficiently applied or resourced.

The collected responses indicate that formal supervisory structures for DGSA requirements exist in the large majority of responding countries.

18 out of 21 countries report that a competent authority performs specific audits related to DGSA obligations, although for United Kingdom this is limited to certain high-consequence dangerous goods and Class 7.

In terms of perceived effectiveness, most countries express a positive view of supervision and authority audits as an enforcement tool.

Eleven countries agree or strongly agree that audits are effective, while four partly agree. However, a minority of respondents express neutral or negative views, indicating that effectiveness is not uniformly perceived across all jurisdictions.

The qualitative comments provide important context: even where supervision structures are in place, several countries report limited inspection frequency, restricted resources, uneven sectoral coverage, or a focus on roadside checks rather than company-level DGSA compliance.

Some respondents highlight the need for stronger enforcement measures, including fines for failure to appoint a DGSA.



A general positive consensus on the efficiency on supervision but at the same time too few are conducted

The presence and efficiency of authority audits and supervision of DGSA



The vast majority indicate the existence of specific DGSA-related audits. Italy, Portugal and Slovakia responded no.

The United Kingdom response specifies limitation to High Consequence Dangerous Goods and Class 7 only.

A majority (75%) express at least some level of agreement that supervision and authority audits are effective.

5 countries (25%) express clear negative positions. Several countries indicate low inspection frequency.

Several indicate limited authority resources or inspection capacity.

Some distinguish between transport controls and company-level DGSA compliance checks.

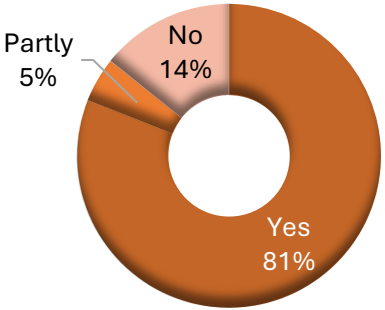
At least three countries explicitly suggest stronger enforcement mechanisms.

Based on the responses to the three questions, the “other opinions” there is seen a need of more authority audits in matters related to dangerous goods and DGSA.

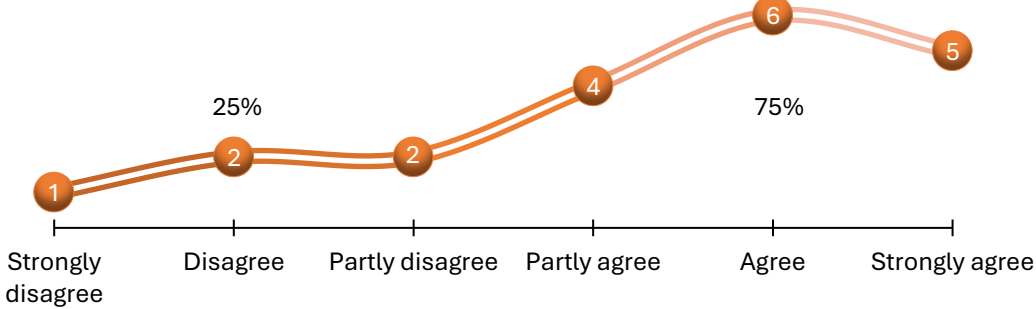
How countries currently address the matter is not seen sufficient.

The “lack of prioritisation” could be explained by that, on each national level, dangerous goods compliance might not be the most significant gap in society to address.

Does the authority in your country perform specific DGSA audits?



Supervision and authority audits is an effective tool of enforcing the DGSA requirement.



19/20 – 1 neutral removed



Effect and benefits

The intention with the questions in this section is to gain a better understanding if it can be assumed that the implementation of DGSA has brought any efficiency and benefit related to transport of dangerous goods as initially intended.

The questions are subjective however, if there is research or other evidence it is appreciated if such are referenced. Please refer if the answer is based on perception or data available.

Effects and benefits, in summary

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

Across responders, a clear majority perceive that the DGSA 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 as a result of the requirement.

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.

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.

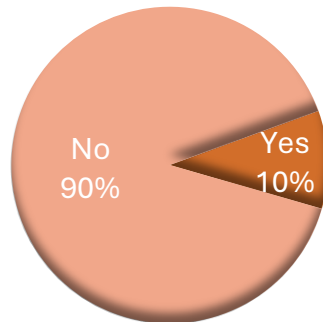
Notably, only two responders indicate the existence of national research or statistical studies evaluating the DGSA's effects. This indicates that most assessments are based on professional experience and perception rather than formal data analysis.



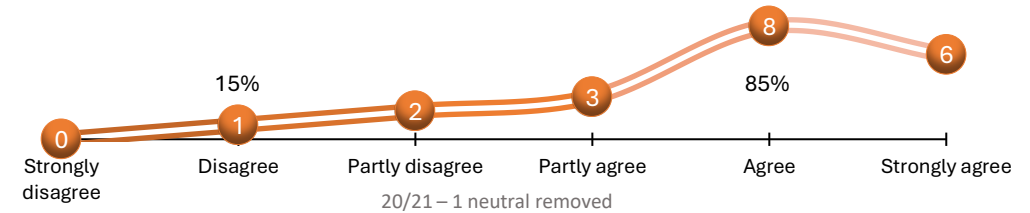
The DGSA positive effects and benefits



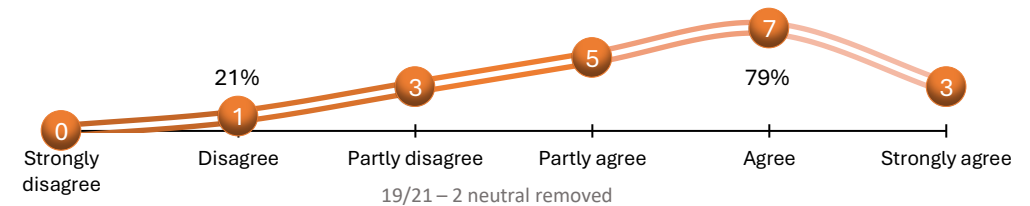
- A clear majority of countries report a positive perceived effect on competence and awareness.
- Considering responses to other questions, DGSA focus significant time on training, information and consulting which would improve awareness.
- Most countries responded Agree or Strongly agree that the DGSA implementation is perceived to prevented incidents and accidents involving dangerous goods during transport.
- There is a perception by the majority that the implementation of DGSA have contributed to reduce incidents and accidents however, several makes a remark that other contributing factors such as ISO and wider application of OHS.
- A majority express at least some level of positive perception that it has increased companies' regulatory compliance.
- The availability of documented national research appears to be very limited, only Sweden and Spain answered “yes”.



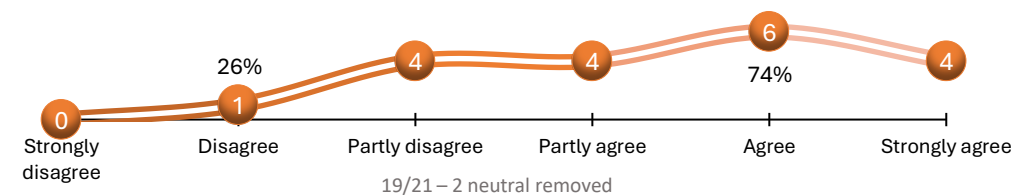
The implementation of DGSA requirement has improved dangerous goods competence and awareness in companies



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



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





Challenges and obstacles

The intention with the questions in this section is to gain a better understanding about which challenges companies and DGSA face.

Challenges and obstacles, in summary

Overall, the responses illustrate that the challenges faced by Dangerous Goods Safety Advisers (DGSA) 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 DGSA 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 DGSA role, and time and resource constraints.

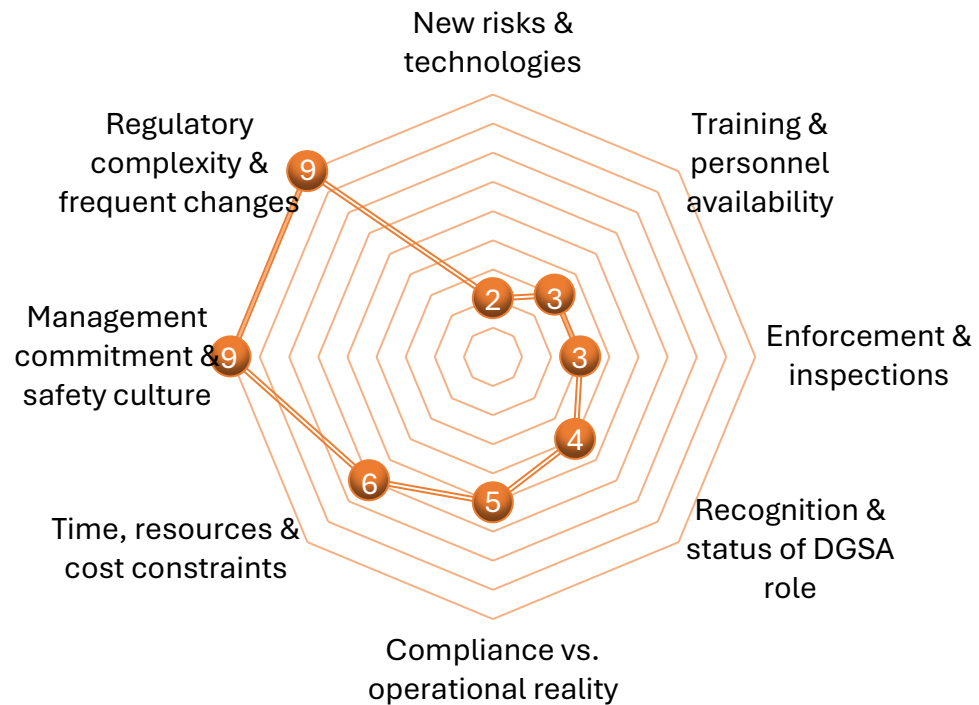
Several respondents also highlight difficulties in ensuring that regulatory requirements are effectively translated into operational practice, particularly in companies with limited safety culture or where compliance is viewed primarily as a formal obligation. Additional concerns include the growing 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 increase the advisory burden on DGSAs. These sectors often require specialised knowledge.

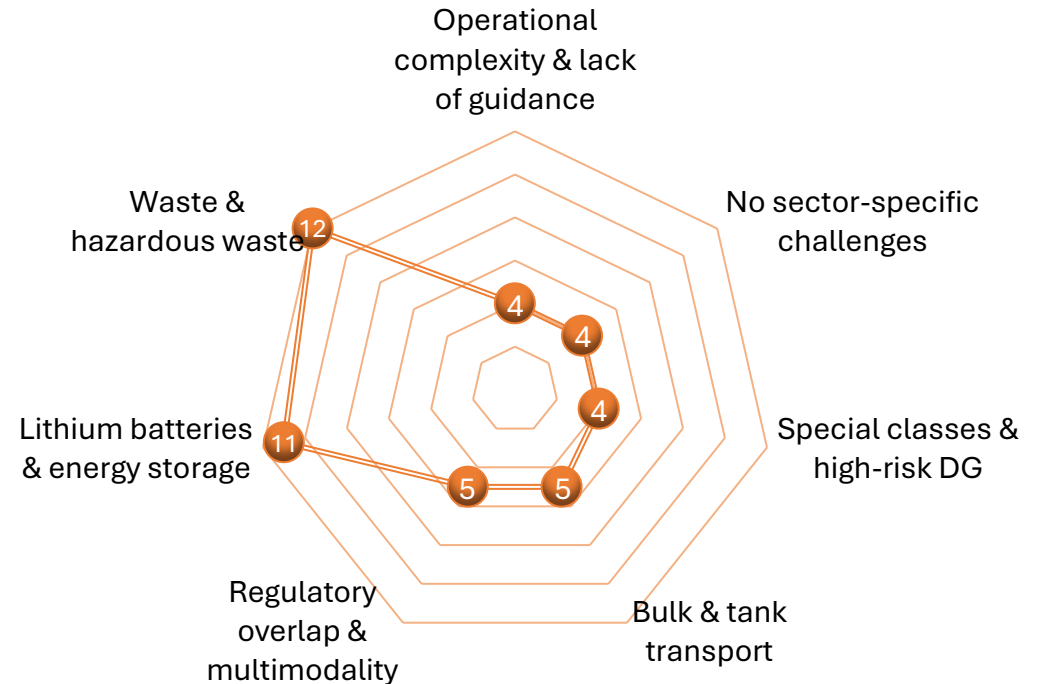
Additional remarks from respondents are the challenges in attracting new professionals to the role, the need for more structured competence development beyond certification, and the importance of management attitudes toward safety within organisations.



Current challenges and obstacles for a DGSA



The most frequently cited challenges for DGSA 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



Future perspectives

The intention with the questions in this section is to be forward looking, what the “world would look like” and changes that should be made to further improve the safe transport of dangerous goods, both nationally and internationally.

Future perspectives, in summary



The input collected for this chapter indicates that most respondents expect the DGSA role to evolve over the coming decade, although the degree and direction of change vary between responders.

Frequently mentioned drivers include digitalisation and artificial intelligence, increasing regulatory complexity, emerging energy carriers, and higher expectations regarding enforcement and oversight.

Several respondents foresee a more strategic, risk-oriented, and professionally recognised DGSA function, while a smaller number anticipate limited or no significant change.

Regarding reforms, there is a consistent call for greater harmonisation in interpretation, examination standards, reporting formats, and enforcement practices.

Many respondents also emphasise stronger supervision, clearer definition of the DGSA mandate, improved competence development, and increased digitalisation of processes.

Expectations for IASA centre on harmonisation, networking, knowledge exchange, regulatory representation, and data collection.

Respondents see IASA as a platform for sharing best practices, supporting interpretation of regulations, strengthening the DGSA role, and representing the community in international forums.

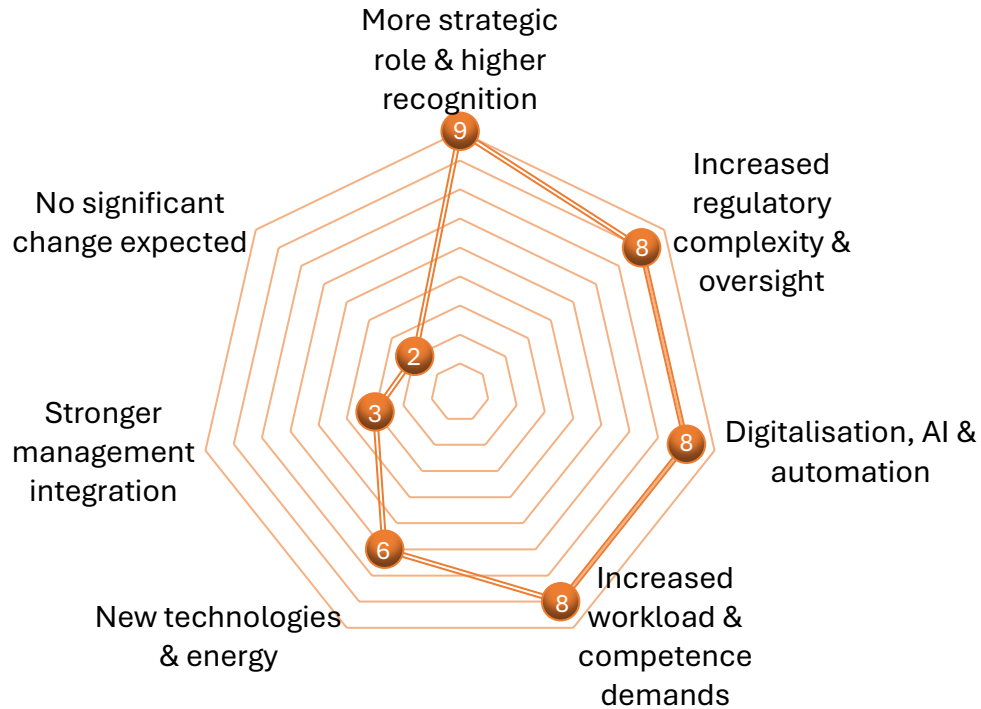
Some also call for improved accessibility and structured statistical reporting.

Additional suggestions to improve the safe transport of dangerous goods focus on enhanced awareness and prevention, wider use of technology and digital tools, increased transparency in enforcement outcomes, expanded modal coverage, and strengthened emergency preparedness.



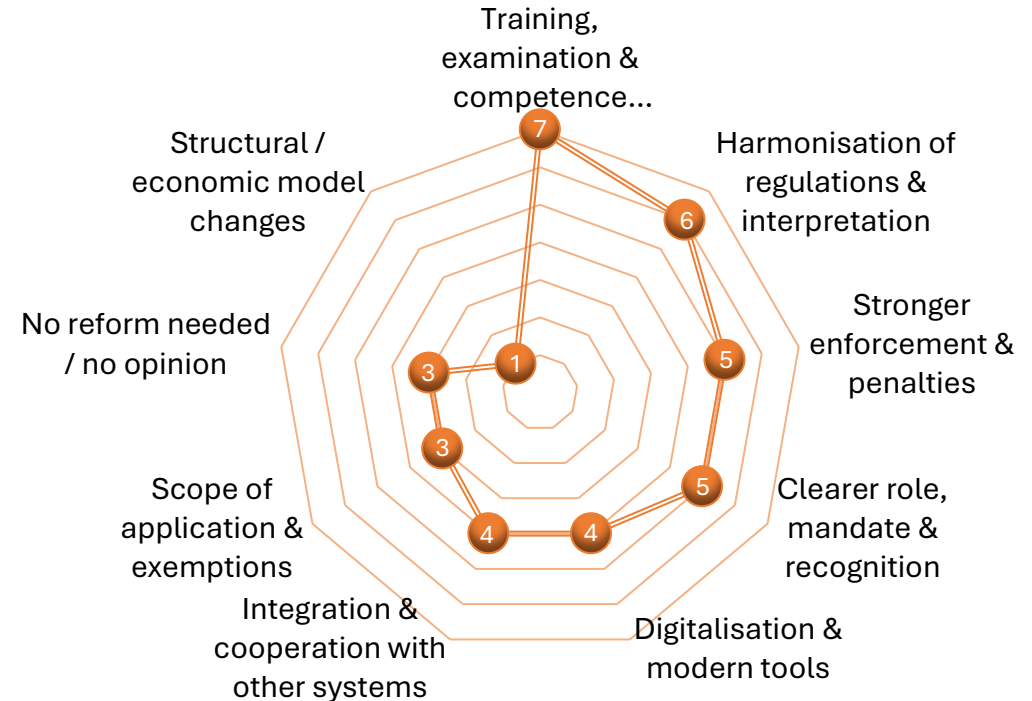
Future changes and reforms needed for the DGSA role

Changes the coming 10 years impacting DGSA



Most respondents expect the DGSA role to become more strategic, digitally supported, and competence-intensive, with only a few anticipating no significant change or expressing no opinion

Reforms and improvements

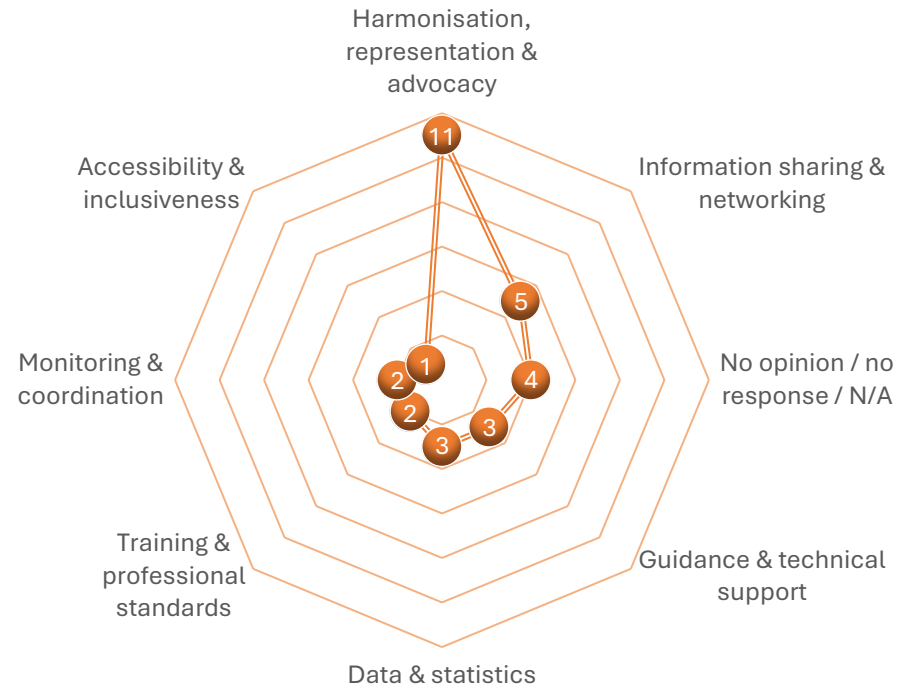


Requests for reform most often focus on regulatory harmonisation and improved training and competence systems, alongside clearer mandates and stronger enforcement

Future changes and reforms needed for the DGSA role

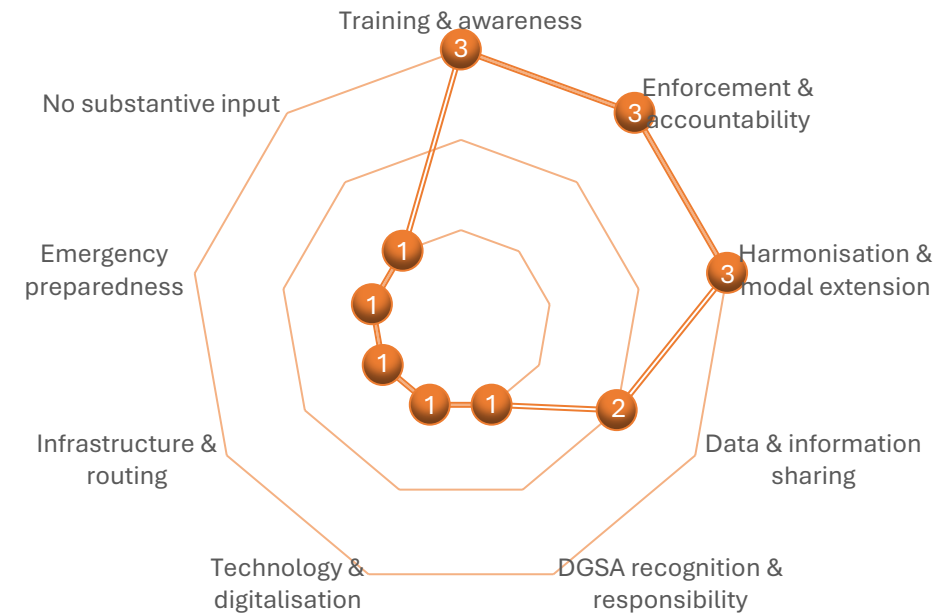


Expectations on IASA to meet the future



The responses indicate that IASA is primarily expected to act as a coordinating, harmonising, and representative body at European and international level, with a strong focus on networking, knowledge exchange, and regulatory influence.

Other changes to improve DG transport safety



Suggested additional improvements most frequently relate to training and awareness, enforcement and accountability, and greater harmonisation across transport modes.



IASA

International Association of Dangerous Goods Safety Advisers