

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

Sub-Committee of Experts on the Transport of Dangerous Goods

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Item 13 of the provisional agenda

Dangerous goods safety training and capacity building

Status of implementation of the Model Regulations in South Africa and status of dangerous goods training

Submitted by the South African National Department of Transport

I. Introduction and background

1. Dangerous Goods Regulations for Transport only came into effect on 03 August 2001.
2. Prior to this in the late 1980s, the major South African Chemical companies voluntarily adopted the United Kingdom Hazchem system as there were no Dangerous Goods Regulations at the time in South Africa, and they had to comply with the IMDG Code and IATA Regulations for exports and imported raw materials were packaged and labelled in compliance with the Dangerous Goods (DG) regulations.
3. In 1989 Industry engaged with the South African Department of Transport (DOT) to bring Dangerous Goods Regulations into law in order to provide for seamless compliance for imports, exports, and the local market, as Industry relied on exports at the time for economies of scale for their operations, especially into the Mining sector, thus had to comply with the IMDG Code, and ICAO/IATA for anything sent by airfreight.
4. The DOT agreed that this was necessary and that it would be done through National Standards in order to be able to keep the regulations up to date with the UN revised editions – at the time there was no authority for test and certification of packaging.
5. In 1989 the DOT appointed the South African Bureau of Standards (SABS) to draw up National Dangerous Goods Standards based on the UN Model Regulations for Transport of Dangerous Goods. In 1992, SABS 0228 Identification and Classification of Dangerous Goods for Transport, and SABS 0229 Packaging and Large Packaging of dangerous goods were published.
6. SABS 0230 Inspection requirements for Road Vehicles, SABS 0231 Operational requirements for road vehicles, SABS 0232 Emergency Information Systems followed, and SABS 0263 Warehousing and Storage (for compatibility and consignment) followed. The SABS also set up Packaging Test laboratories for the test and certification of dangerous Goods packaging.
7. In 1996 the DOT joined the UN Committee of Experts for Transport of Dangerous Goods as Observer and became a full Member in 1999.
8. The National Road Traffic Act No 93 of 1996 included all aspects of Road Transport and includes Chapter VIII Dangerous Goods which brought the SABS Standards into law. This Chapter came into effect on 03 August 2001.

II. Current status of dangerous goods regulations and dangerous goods training

9. The SA Civil Aviation (SACAA) Dangerous Goods Regulations came into effect in 1997 and the SACAA has representation on the ICAO Dangerous Goods Panel, thus keeping abreast of the latest revisions of the aviation regulations. SACAA gazetted revised Dangerous Goods Regulations in March 2023, including a requirement for competence training.

10. SAMSAs the SA Maritime Safety Authority was formed and given powers under its founding Act, the SAMSAs Act 5 of 1998 which includes compliance with the IMO Legislation and the IMDG Code and its revisions which includes mandatory training for shore-side personnel, which however is not currently monitored.

11. The SABS National DG Standards are currently under review to fully align them with the latest revised edition(s) of the UN Transport of Dangerous Model Goods as encouraged by the UNTDG secretariat and to align them with the aviation and maritime dangerous goods regulations. This will include training that is currently not regulated or monitored for road and rail, except for operators/owners and drivers of dangerous goods vehicles.

12. The South African Qualifications Authority – SAQA is the oversight body for Unit Standards for Training in all sectors of the economy. This is independent of, and separate from the National Standards Body. These Unit Standards provide the frameworks for training content in different disciplines.

13. The Dangerous Goods Unit Standards are now under review to align with South Africa’s International Dangerous Goods Commitments for all transport modes.

14. Once revised the Unit Standards will provide the Framework for Dangerous Goods Training for all transport modes. It is intended that the revisions will be in place so that DG training can be monitored and enforced later in 2024.

III. Proposal

15. The DOT requests the Sub-Committee to take note of this report.
