



DANGEROUS GOODS

- what you should know

Please note that the information contained in this document is written specifically for those involved in farming and agricultural contracting, and whose carriage of dangerous goods is for agricultural purposes. If your carriage of dangerous goods is for purposes other than agriculture, **such as construction**, you must seek further guidance.

What are dangerous goods?

Dangerous goods are materials or items with hazardous properties which, if not properly handled, present a potential hazard to human health and safety, the environment, infrastructure and/or their means of transport.

The Dangerous Goods List is extremely long and complicated. You can generally determine whether or not your goods are dangerous by contacting the 'manufacturer or Dangerous Goods Safety Adviser, and reviewing for the presence of warning labels or by referring to the SDS (Safety Data Sheet).

The carriage regulations

The Regulations which cover the carriage of dangerous goods on the road in the UK are

- CDG (The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009); and
- ADR (International Carriage of Dangerous Goods by Road).

The following questions will allow you to determine whether you or your activities come within the scope of ADR and if so, what you should do and who you should consult.

- 1 Are the goods you wish to carry classified as dangerous?
- 2 Is the vehicle you are using exempt from the regulations?
- 3 Is the journey you are planning exempt from the regulations?
- 4 Does the type and quantity of goods you are carrying qualify for partial exemptions?

When is my vehicle exempt?

The main parts of the regulations do not apply where carriage is "not undertaken by a vehicle".

This exemption links to [The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009](#) definition of a vehicle and means that the regulations do not apply to:

- Vehicles with a maximum design speed of 25 km/hour or less.
- Vehicles that run on rails.
- Mobile machinery (not defined). This could include vehicles specially equipped for road construction purposes, such as white lining vehicles.
- **Agricultural or forestry tractors that do not travel at a speed exceeding 40km/h (24.85mph) when transporting dangerous goods; or any trailer being towed by such a vehicle.**

What is an agricultural or forestry tractor?

There is no firm definition of an “agricultural or forestry tractor” and so cases are judged on their merits. Taxation class, legal use of “red diesel”, and fittings common to tractors such as PTOs and three-point linkages for attachment of agricultural implements are all things that could be considered by a court when evaluating whether the vehicle is an “agricultural or forestry tractor”.

Subject to any court decision, **vehicles, such as Land Rovers, pickups and other 4x4 road vehicles are not regarded as agricultural or forestry tractors.**

Although this means that moving dangerous goods by tractor and trailer or tanker is mostly exempt from the majority of regulations if travelling under 40km/h (24.85mph), you still need to ensure that whatever you are using to carrying the dangerous goods, such as a bowser, is roadworthy and free from any leaks. Agricultural vehicles being used solely for construction cannot claim the exemptions mentioned in this document which are afforded to agriculture.

Fuel, bowzers, and intermediate bulk containers

Behind a tractor

If diesel is carried in bowzers – either a tank or an IBC (Intermediate Bulk Containers) (as defined in the regulations) by a tractor at speeds of under 40km/hr the operation is exempt from ADR. You can carry up to the maximum design capabilities of the bowser as long as the combined weight of the bowser and fuel does not exceed 18.29 tonnes, in addition to it being safe and roadworthy. Dangerous goods markings, such as Class 3 placards, identifying what is being carried will help emergency services in the event of an incident, although this is not a legal requirement.

Towing behind another vehicle eg, 4x4

If a bowser with a capacity exceeding 1,000 litres is pulled by other vehicles such as 4x4 vehicles, they **would not** qualify for the exemption. Bowzers manufactured before 10 May 2004, are no longer allowed to transport fuel on public roads if they are classed as tanks rather than an IBC.

A good way of knowing whether your bowser is an IBC rather than a tank (other than checking the documentation that came with the purchase) is that IBCs need to be 110% bunded. This means a secondary tank capable of holding 110% of the capacity of the internal tank, acting as a safety barrier should there be any issues with the primary tank. A bowser that is single skinned will not be compliant.

A certified IBC will have an approval mark that starts with UN followed by a code, such as 31A/Y/12.03/GB/FW-3348/5207/2893. The mark will be found on a metal plate fixed to the IBC.

If a bowser/IBC is not fitted with a plate, then it cannot be used on the road for dangerous goods.

If the load is packaged and labelled accordingly, and does not contain more than 1,000 litres, the small load exemptions apply and the operation would be exempt from much of the regulations as previously discussed.

You must still undertake the following:

- Carry at least 2kg of an appropriate fire extinguisher, which complies with [ADR regulation 8.1.4](#)
- Driver must have had dangerous goods awareness training. Dangerous goods awareness training can be provided via a formal course or via cascade training by a competent person. It is also a requirement to keep a record of this training.
- You must label the bowser appropriately with the UN Code 1202 and display the Class 3 hazard diamond on two opposite sides.

If you carry more than 1,000 litres, the full regulated load requirements apply. This means the driver will need full ADR training that lasts five years, full dangerous goods equipment as well as fire extinguishers.

When is my load exempt?

Small loads, depending on the type of product, are exempt from much of the regulations. Small load exemptions do not apply to tankers or bulk carriage.

The transport category, found in [ADR section 1.1.3.6](#), outlines the load limit in which to qualify for the exemption. For example, methanol is in transport category 2, which has a limit of 333 litres to qualify for the small loads exemption.

If the load limits are respected, most of the ADR regulations do not apply. In most cases the remaining obligations are:

- General awareness training for the driver, which must be recorded.
- A 2kg dry powder fire extinguisher or equivalent that complies with ADR must be carried.
- The dangerous goods must be stowed properly.

A note on fertilisers and spreaders

Many fertilisers are classified as dangerous goods. This includes ammonium nitrate based fertilisers (UN2067) and other compound based ammonium nitrate based fertilisers (UN2071). The numbers given in brackets are UN numbers assigned to each individual dangerous good.

If you are carrying ammonium nitrate in a spreader behind a tractor which does **not travel at a speed exceeding 40km/h when transporting dangerous goods**, you would be exempt from the majority of ADR requirements.

Note that the current speed limit for most tractors is 20 mph (32 km/h).

Load security

Regardless of the dangerous good in transport or the vehicle being used to transport, ensuring the security of the load is **always** essential.

If using ratchet straps or chains to secure the load eg, securing bags of ammonium nitrate to a flatbed trailer, it's important to ensure they're suitable, aren't damaged, and rated for the weight they're securing.

A lashing point is only as strong as its weakest component, so it's important to make sure that all parts of the lashings and the attachment points are in a suitable condition and appropriate for the intended use.

Not only is it the legal responsibility of the driver of the vehicle, but also the employer, to ensure the load is secure.

For more information on load security, visit the following websites:

- <https://www.gov.uk/guidance/securing-loads-on-hgvs-and-goods-vehicles>
- <https://www.hse.gov.uk/logistics/load-security.htm>

Although the guidance is directed at HGVs, much of the content is relevant to agriculture, particularly when using a flatbed trailer.

What if I don't fit into any of the above exemptions?

If you have found that your goods are classified as dangerous, the vehicle you are using is not exempt and the quantity you're going to carry is above the load thresholds, then it is likely that your operation will come into the scope of the full ADR requirements.

This guide cannot cover all of the full requirements of ADR. However, the detailed regulations are all available for free online here: [ADR 2025 - Agreement concerning the International Carriage of Dangerous Goods by Road | UNECE](#)

Disclaimer and important information

This document is intended to provide general guidance and awareness to (NFU) National Farmers' Union members on the subject of Carriage of Dangerous Goods. It has been prepared in good faith and is based on legislation and understanding at the time of publication.

However, this document does **not** constitute legal, health and safety, or other professional advice. The NFU has taken all reasonable care in preparing this material, but we can accept no responsibility for any errors, omissions, or subsequent legislative changes, or for any consequences arising from individual circumstances which cannot be fully accounted for herein.

It is the **sole responsibility of the operator, driver, and duty holder** to ensure that their activities are fully compliant with all current and applicable legislation, including but not limited to The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (as amended) and the ADR Agreement.

Before undertaking any activity involving the carriage of dangerous goods, you should satisfy yourself that you have understood and met all legal requirements, and we strongly recommend that you seek specific professional advice tailored to your individual operations.

NFU members can obtain free initial Legal and Professional advice from NFU CallFirst on **0370 845 8458**.

This document covers the exemptions afforded to agriculture. If your carriage of dangerous goods is for purposes other than agriculture, such as construction, you must seek further guidance as the provisions do not apply

There is also a wealth of information on the government and HSE websites on the carriage of dangerous goods at the following links:

- Government website - [Transporting dangerous goods - GOV.UK](#)
- HSE - [Carriage of dangerous goods \(CDG\) - HSE](#)

For those operating in Northern Ireland, visit [CDG NI regulations](#) or reach out to [HSENI](#) for more guidance.

Working with young people

Extra care should be taken when having a young person undertake a task involving dangerous goods. The young person should have received the necessary dangerous goods training, including what to do in the event of an accident eg, use of spill kit, as well as be competent at handling the vehicle and/or machinery used to undertake the task.

For more information on young people at work, visit HSE's website - [Young people at work: Overview - HSE](#)

Useful contacts



Department
for Transport

Email: dangerousgoods@dft.gov.uk

Dangerous Goods Safety Adviser:

[Find a dangerous goods safety adviser - GOV.UK](#)

This guidance is for general information purposes only and is not a definitive guide to the law. It is not a substitute for professional advice. You must ensure your own compliance with all applicable legislation.