



An tÚdarás Sláinte agus SábháilteachtaHealth
and Safety Authority

European Communities (Carriage of Dangerous Goods by Road and Use of Transportable Pressure Equipment) Regulations 2011 to 2023

Competent Authority Exemption 07/2024

Applicable To National Road Transport Only

Exemption from the requirements of ADR 4.3.4.1 with respect to the hierarchy of tanks for the carriage of UN 3336

The Health and Safety Authority as competent authority appointed under Regulation 10 of the European Communities (Carriage of Dangerous Goods by Road and Use of Transportable Pressure Equipment) Regulations 2011 to 2023, and in accordance with Regulation 5(4)(a), hereby exempts Robinson Brothers Limited, Pheonix Street, West Bromwich B70 0AH, UK from the requirements of ADR 4.3.4.1 with respect to the hierarchy of tank codes.

The tank codes indicated in Table A of Chapter 3.2 of the ADR for UN 3336, MERCAPTANS, LIQUID, FLAMMABLE, N.O.S. or MERCAPTAN MIXTURE, LIQUID, FLAMMABLE, N.O.S. of packing group I, II and III, are L4BN, L1.5BN and LGBF.

Under this exemption, ADR tank-vehicles, **serial numbers 13.2371 and 19.3515 of ADR tank code C9.9DH**, operated by Robinson Brothers Limited, are permitted for the carriage of UN 3336 in the Republic of Ireland, on condition that the tank is accompanied by a valid certificate of inspection by a suitably accredited tank inspection body.

The following supplementary provisions shall be complied with:

1. The transport operations shall be permitted between Dublin Port and the consignee's premises only.
2. Direct involvement in the transport and delivery operation is permitted only by trained and experienced members of the Robinson Brothers Limited gas odorant team.
3. Prior to each transport operation, a risk assessment shall be carried out for all aspects of the operation, including a visual inspection of the relevant tank to confirm that it is safe for carriage. Any risks identified shall be mitigated and

if routine examinations or maintenance indicate a requirement to do so, additional pressure tests shall be carried out by Robinson Brothers Limited.

4. A copy of this exemption, and a valid certificate of inspection by a suitably accredited tank inspection body, shall accompany the transport documentation and shall be made available to anyone who has a legitimate interest in the transport operation.
5. This exemption shall be drawn to the attention of any inspection body prior to the tank inspection taking place.
6. In all other respects, the transport operations performed in accordance with this exemption shall comply with the relevant requirements of ADR.
7. Any incident resulting in loss of containment of a substance during the transport journey shall be reported immediately by the participant in control of the transport operation to the emergency services and to the Authority:

Health and Safety Authority
The Metropolitan Building
James Joyce Street
Dublin 1
D01 K0Y8

Email: contactus@hsa.ie

Phone: 0818 289 389

8. The Authority may withdraw this exemption for failure to observe any of these conditions or for any other reason, which the Authority deems sufficient.

This exemption is effective immediately and expires on **31 October 2029**.

Date: 22 March 2024



Conor O'Brien
Chief Executive Officer
Health and Safety Authority