



The Offeror's Role in U.S. Highway Vehicle Placarding

We all know that when it comes to dangerous goods training, we need to be trained in the requirements that are specific to the mode of transportation we are utilizing, and these requirements may be based on international standards. For example, air shipments typically must be prepared in accordance with the ICAO/IATA requirements in order to be accepted by the airline, and U.S. regulations permit us to do this (within limitations). However, unless you have an aircraft or a ship pulling up at your loading dock (and we concede that some of you just might...), your shipment will most likely leave your facility initially on a truck, and that truck must be placarded for the hazardous materials it contains.

The placarding applicability requirements of U.S. 49 CFR Part 172, Subpart F (§172.500(a)) specify that "each person who offers for transportation, or transports any hazardous material subject to this subchapter shall comply with the applicable placarding requirements of this subpart". Further, §172.506(a) requires that "each person offering a motor carrier a hazardous material for transportation by highway shall provide to the motor carrier the required placards for the material being offered prior to or at the time the material is offered for transportation, unless the carrier's motor vehicle is already placarded for the material as required by this subpart." §172.506(a)(1) states that "no motor carrier may transport a hazardous material in a motor vehicle, unless the placards required for the hazardous material are affixed thereto as required by this subpart." **What this means is that the responsibility for placarding is a shared by the offeror and the motor carrier - both are responsible for the vehicle being properly placarded.** If your training is focused solely on the international standards and requirements for a particular transport mode, the U.S. highway placarding requirements may not even come up as a training topic!

To ensure that you are complying as a dangerous goods shipper/offeror:

- Maintain your knowledge of the placarding requirements of 49 CFR Subpart F, including the many exceptions contained in that subpart.
- Be sure to offer the required placards to your motor vehicle driver – if you offer the placards but they do not need them because their vehicle already has placards, request that they provide their signature attesting to that.
- Ensure that any required placards are properly displayed on the vehicle prior to it departing your facility.

Transportation of dangerous goods requires cooperative effort to keep all of us safe and compliant – thank you for your contributions!

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