

Understanding ADR Regulations 2025 – Key Changes for Asbestos Management

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Changes to ADR 2025

For ADR 2025, the entries in Dangerous Goods List (table A in chapter 3.2) for UN 2212 (ASBESTOS, AMPHIBOLE) and UN 2590 (ASBESTOS, CHRYSOTILE) have been updated to include the following codes:

Column number	Codes inserted
(6)	678
(17)	VC1, VC2, AP12
(18)	CV38

SP678, AP12, and CV38 are new provisions. Together with the existing VC1 and VC2, these provide for the carriage of bulk waste in container bags. Requirements for transport documents (5.4.1.1.4) are amended to reflect this.

SP678 container bag



Interpretation for SP678

- Large container bags for use in bulk transport do not have to be UN-approved or manufactured to a particular standard
- They must be suitable for the task, as defined in ADR, and dust-tight
- In particular, they must be resistant to foreseeable damage in transit and during unloading
- They must be loaded in a high-sided container to protect the sides of the bag, but a single bag the size of the load compartment does not have to be sheeted
- The load compartment must have rigid metal walls of sufficient strength for its intended use.
- Bags are a single-use system and should be loaded by mechanical means
- The total mass of the load in a bag must not exceed 7,000 kg
- Each shipment shall be considered a full load
- There must be no intermediate handling of the container-bag

Requirements cannot be seen in isolation

ADR

HSWA

CAR2012

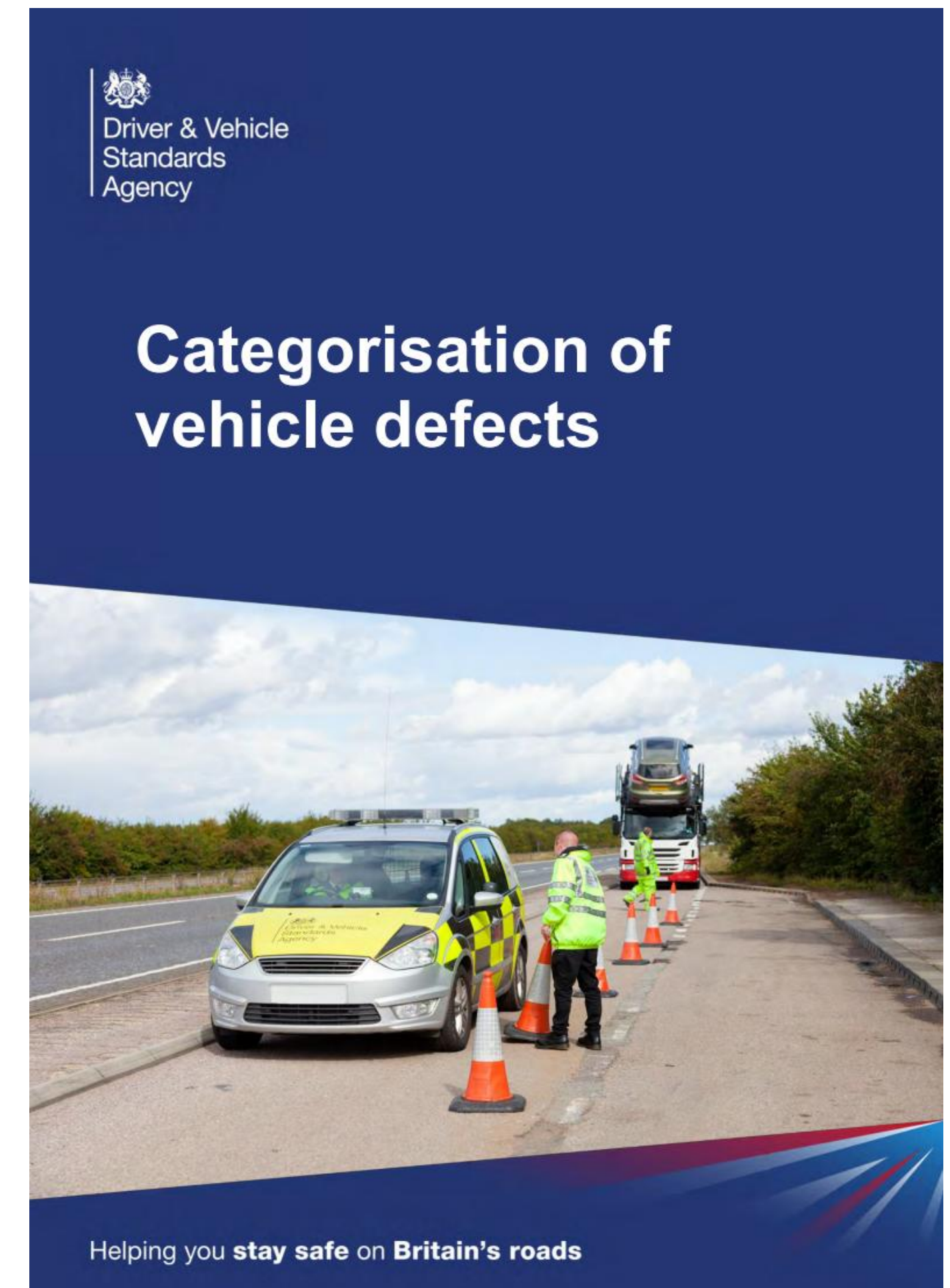
C&U

What does C&U compliance look like?

The new enforcement approach was released in May 2022. It applies to all vehicles and all load types. DVSA also publishes guidance.

Loads in open vehicles must be covered, either by a rigid cover or a sheet, or secured by another means such as strapping. The sides of the body alone are not sufficient. It is a PG9 prohibition defect if the load is not covered, which can affect the operator's OCRS.

When transporting under SP678 – and only under SP678 – the single large container-bag does not have to be covered.



Example – transporting asbestos cement sheet

- AC sheets can be transported under SP168 if they are in good condition, but CAR2012 requires them to be wrapped in heavy-duty polythene (1000 gauge or equivalent).
- How feasible it is for workers to wrap sheets will dictate how they are wrapped – it may be possible for two or three sheets to be manually wrapped before loading, or they may need to be mechanically moved unwrapped to a double-lined skip and wrapped that way.
- SP168 does not apply if the AC is broken, weathered, or badly damaged.
- SP678 applies to loads contaminated with asbestos, such as soil, furniture, PPE & RPE, or equipment from damaged buildings and construction sites.
- So, if neither SP applies, eg to broken AC sheets, the load can be transported in a double-lined skip with either a solid roof or a robustly secured non-rigid cover e.g. roll top. A load not contained in this way would likely be an insecure load under C&U.

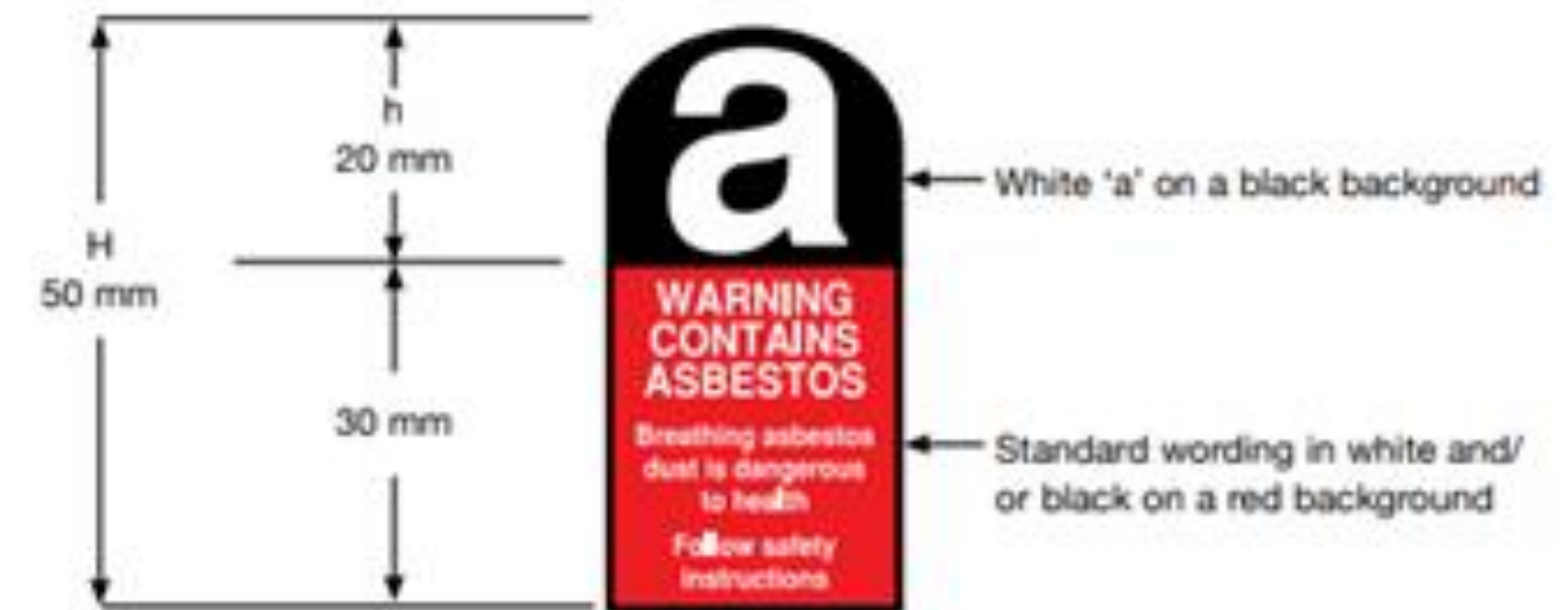
Roll top ROROs



If moving under SP168, ADR/CDG does not apply.

However!

- Warning label still needed under CAR2012
- Load still needs to be covered, either by a rigid cover or robust sheet, under C&U



Thank you