

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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PROCEDURE FOR INCIDENT REPORTING

Transmitted by the Dangerous Goods Advisory Council (DGAC)

Discussion

1. There are currently no provisions within the Model Regulations that require a carrier to submit a report to the competent authority if an accident or incident takes place during the transport of dangerous goods. We note that the ICAO Technical Instructions, IMDG Code, the ADR and some national authorities have established procedures for incident reporting but these provisions vary widely. The provisions are intended to provide needed information to evaluate the effectiveness of existing regulations and operating procedures.
2. DGAC supports the reporting and collection of dangerous goods accident/incident data and believes that provisions should be incorporated into the UN Model Regulations to encourage States and modal authorities to implement programs within their regulatory systems to effect that objective. Further, we believe the information reported should be as consistent as possible in order to make maximum use of data analysis. This is particularly true for incident reporting since this information can be invaluable for determining whether a packaging is deficient or whether there is a sound basis for revision of a performance standard. In some cases, proposals to the UN Transport Sub-Committee advocating changes to performance standards appear to have been made on the basis of incomplete or very limited accident/incident data. This is not surprising given the present situation with differing reporting requirements. Furthermore, the data usually represent the experience of a single country rather than the global shipping community. Although we recognize that no reporting system is likely to contain a complete compilation of data, the addition of reporting provisions to the Model Regulations should improve both the frequency of reporting and consistency of the data reported. Over time, the data collected would provide the basis and factual support for proposing revisions to the packaging standards contained in the Model Regulations.

Proposal

3. Add a new paragraph to Chapter 7.1 (Provisions concerning transport operations by all modes of transport):

“7.1.8 Reporting of Accidents or Incidents Involving Dangerous Goods in Transport

- 7.1.8.1 An operator shall report dangerous goods accidents and incidents to the appropriate authorities of the State in which the accident or incident occurred, in accordance with the reporting requirements of the appropriate authorities.
 - 7.1.8.2 An accident or incident shall be reported when a significant quantity of dangerous goods is unintentionally released or if significant personal injury, property damage, or environmental damage has occurred as a result of the release.
 - 7.1.8.3 Information reported shall include the description of the goods (e.g. proper shipping name (including technical name, if any), UN number, class/division, packing group), description of the accident/incident, date and location, estimated loss of dangerous goods, packaging information (e.g. packaging type, identification markings, capacity and quantity) and cause and type of any packaging failure that resulted in a release of dangerous goods.
 - 7.1.8.4 The competent authority may specify certain types of dangerous goods (e.g. Batteries, wet, filled with acid) or quantities of dangerous goods which are excepted from these requirements for reporting accidents or incidents involving dangerous goods.
 - 7.1.8.5 The State receiving the report shall forward a copy to the secretariat of the Transport Division of the United Nations Economic Commission for Europe for distribution to the Sub-Committee of Experts on the Transport of Dangerous Goods.”
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