

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

4 March 2013

Bern, 18–22 March 2013

Item 8 of the provisional agenda

Any other business

Comments on ECE/TRANS/WP.15/AC.1/2013/13 risk evaluation procedures in the transport of dangerous goods

Transmitted by the Government of France

1. France would like to express his gratitude to the government of Germany for raising the issue of risk evaluation again, and for the effort made in gathering related information.
2. We do not share some of the “pessimistic” conclusions of the document
3. The fact that not many answers came for the survey doesn’t automatically means a lack of interests in the subject. France did not answer yet but we are nevertheless very much in favor of further work on risk assessment.
4. The questions raised at the end of the document might have become obsolete because work is already going on in that field at EU level.
5. After some discussions concerning derailment detection, were risk based approaches have been used in the decision making process, the idea of working on risk based approaches in the more general context of transport of dangerous goods has been raised. Therefore a call for tender has been launched at EU level:

Invitation to tender No. MOVE/B2/2012-31 concerning
Harmonised Risk Acceptance Criteria for Transport of Dangerous Goods
(see attached document n°1 tender specifications)

6. At this point the relevant questions to ask may not be “do we want to do further work on risk assessment?” but “how do we relate to the work that will be done at EU level?”
7. Furthermore we would like to offer some more substantial comments on the subject. According to the definition in the conducting thread mentioned in chapter 1.9 the process of Risk management starts with a risk analysis leading to a “risk estimation” (assigning values to the probability and the consequences of a risk.) the comparison of the values so calculated with a “tolerable risk” leads to the “risk evaluation” and depending on the agreed criteria to a decision to take some measures (or not).
8. The process as described in the conducting thread is in itself very rational. Some of the steps in it are more or less subjective and depending on political decisions (such as the tolerable level of risk). However even in the most solid factual scientific part of it, the “risk estimation” very big flaws may appear. This is demonstrated in a study conducted in 2002 in the field of chemical establishments, but the principle conclusions can be used also in the context of transport: if not taken care of by a harmonized way if defining input values

supported by solid technical data huge deviations may appear depending on the analyst. (see attached document n°2 “Assessment of Uncertainties in Risk Analysis of Chemical Establishments The ASSURANCE project “)

9. We believe that the starting point of any approach based on risk assessment should be the construction of a solid risk estimation method leading to harmonized results when calculating probabilities for an accident to happen and harmonized results when calculating its effects (damages ...).

10. As stated in some of the answers the answers to the questionnaire sent by Germany the most important point here is to gather data both on accidents their frequency and their correlation to relevant traffic.

11. Without this basic elements any further development is flawed.

12. We would like to draw the attention to some discussion items in the joint meeting that are directly related to this point:

a) The proposal to develop an accident database mentioned in an INF document from the secretariat and France under the agenda of that session which would allow both to gather data for estimating the likelihood of an event and some of its effects.

b) The proposal to use telematic applications (once and if the decision is made to put them in place) in order to get precise traffic data in easy and economical way, which would allow probabilities calculation based on frequencies. Otherwise alternative less precise traffic statistics must be found.

13. And finally we would like to mention that France has initiated a study to develop a risk assessment methodology specifically oriented towards marshaling yards, because some issues have been raised about their compatibility with close dense urban areas. The body selected to conduct this study is DNV. The study is supported by ERA. France invites interested competent authorities to help us in providing their accident data. The result of the study although limited in scope could be a part of a more general approach. Of course the results would be published for the benefit of all railways operators and competent authorities.
