

Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

1 July 2016

Sub-Committee of Experts on the Transport of Dangerous Goods

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Item 11 of the provisional agenda

Other business

Evaluation of the global and regional impact of UNECE regulations and United Nations Recommendations on the transport of Dangerous Goods (2005 – 2014): Questionnaires results

Note by the secretariat

Introduction

1. During the summer of 2015 and as part of the Evaluation of the global and regional impact of UNECE regulations and United Nations Recommendations on the transport of Dangerous Goods (2005 – 2014), the secretariat sent questionnaires to governments, NGOs and IGOs. The results of the questionnaires, as well as some comments and analysis by the secretariat, are presented in the annex to this document.

2. Information related to competent authorities, as requested in ECOSOC resolution 2015/7 will be posted on the UNECE website at a later stage.

3. The secretariat would like to express its sincere thanks and appreciation to all governments, NGOs and IGOs that replied to the questionnaire.

4. The evaluation prepared by a consultant will be made available at a later stage when the management response is ready.

5. The electronic version of the document can be found at

<http://www.unece.org/fileadmin/DAM/trans/doc/2016/dgac10c3/UN-SCETDG-49-INF74e.pdf>

Questionnaire results

Questions 1 to 5 were dedicated to identify the name, contact information, country and functions of the persons responding. Corresponding data from all 3 questionnaires is kept confidential.

Results

Competent authorities from the following 30 countries replied to the questionnaire:

Costa Rica, Thailand, Peru, Belgium, Brazil, Turkey, Germany, Bulgaria, Lithuania, Denmark, Spain, Norway, United States of America, France, Switzerland, Slovakia, Portugal, Romania, Belgium; Luxembourg, Latvia, Norway, Netherlands, United Kingdom, Sweden, Canada, Finland, Australia, Austria and Malta.

The responses were not geographically representative. While in some countries the questionnaire was answered by several competent authorities, no answers were received from African countries.

A total of 24 NGOs replied to the questionnaire:

Dangerous Goods Advisory Council, Verein der Kohlenimporteure e.V., IPPIC - International Paint and Printing Ink Council, IFDI, European Skippers Organisation (ESO), SAAMI, CIPA, IATA, CLEPA, Compressed Gas Association (CGA), Recommended ADN Classification Societies, Cefic, OICA, Union Internationale des chemins de fer (UIC), Eucobat aisbl, International Road Transport Union (IRU), Institute of Makers of Explosives, International Dangerous Goods and Containers Association (IDGCA), Lloyd's Register, RECHARGE, European Industrial Gases Association, International tank Container Organisation, Australian Explosives Industry Safety Group and IFFO.

6 IGOs replied to the questionnaire:

International Maritime Organization (IMO), World Health Organization (WHO), IAEA, Intergovernmental Organisation for International Carriage by Rail, ICAO and Universal Postal Union.

Q.6: (Governments' questionnaire) Status of the answers (please tick as appropriate)

<i>answered question</i>	36
<i>skipped question</i>	1

Results

36.1% respondents indicated that they have filled the questionnaire after consultation with other relevant governmental entities and therefore the answers represent the coordinated views of their governments.

50% of the respondents filled the questionnaire only for matters falling within their area of responsibility.

Finally, **13.9%** of the respondents filled the questionnaire in their personal capacity (i.e the answers provided do not necessarily represent their governments view)

Q.7: Does your country regulate domestic transport of dangerous goods?

Answer Options	Yes	No	Response Count
by road	33	0	33
by rail	30	2	32
by inland waterways	20	12	32
	<i>answered question</i>		36
	<i>skipped question</i>		1

Questionnaire results

Q.8: Does your country require compliance with the requirements of the following international legal instruments for DOMESTIC transport of dangerous goods?

Answer Options	Yes	No	Response Count
ADR	25	8	33
RID	23	10	33
ADN	15	18	33
SMGS	2	23	25
<i>answered question</i>			36
<i>skipped question</i>			1

Q.9: If Yes, then

Answer Options	Partly	Significantly	Fully	Response Count
ADR	1	2	22	25
RID	0	0	22	22
ADN	0	0	14	14
SMGS	1	0	1	2

Which edition?

Answer Options	2015	2013	2011	Response Count
ADR	22	0	1	23
RID	19	1	0	20
ADN	12	1	0	13
SMGS	2	0	0	2
<i>answered question</i>				28
<i>skipped question</i>				9

Q.10 : Does your country ENVISAGE requiring compliance with the requirements of the following international legal instruments for DOMESTIC transport of dangerous goods in the future?

Answer Options	No	Yes	Response Count
ADR	5	17	22
RID	6	14	20
ADN	12	10	22
SMGS	11	6	17
<i>answered question</i>			27
<i>skipped question</i>			10

Questionnaire results

Q.11: If the requirements applicable to domestic inland transport of dangerous goods in your country are not those of ADR, RID, ADN or SMGS, are they nevertheless based on the UN Recommendations on the Transport of Dangerous Goods, Model Regulations?

Answer Options	Response Percent	Response Count
No	18.2%	2
Yes, partly	9.1%	1
Yes, significantly	36.4%	4
Yes, fully	36.4%	4
<i>answered question</i>		11
<i>skipped question</i>		26

Results

It is important to notice that 81.9% of the requirements applicable to domestic inland transport of dangerous goods that are not those of ADR, RID, ADN or SMGS, contain provisions partly, significantly or fully based on those of the United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations.

Q.12: if Yes, on what edition of the UN Recommendations are they based?

Answer Options	Response Percent	Response Count
18th revised edition	70.0%	7
17th revised edition	10.0%	1
16th revised edition	0.0%	0
15th revised edition	0.0%	0
14th revised edition	10.0%	1
13th revised edition	0.0%	0
12th revised edition	10.0%	1
Previous edition (please specify)		2
<i>answered question</i>		10
<i>skipped question</i>		27

Results

Countries that are not Contracting Parties to ADR, RID, ADN or SMGS, mentioned that they apply provisions mostly based on the 18th revised edition of the United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations (Orange Book) i.e. the same edition on which the current (2015) versions of ADR, RID, ADN and SMGS are based.

Questionnaire results

Q.13: Are packages, freight containers and portable tanks containing dangerous goods, which are in conformity with the IMDG code or ICAO TI, accepted for transport by road, rail and inland waterways, prior to or following maritime or air transport, even when they are not in full conformity with your domestic transport regulations?

Answer Options	Response Percent	Response Count
Yes	84.8%	28
No	15.2%	5
<i>answered question</i>		33
<i>skipped question</i>		4

Analysis/ comments by the secretariat

This question may have been misunderstood. The 5 negative answers come from respondents from 4 countries which apply ADR (4), RID (4) and ADN (2), including the provisions of 1.1.4.2 (allowing such divergences), to domestic transport.

Q.14: If your national regulations are available online, please provide the relevant links. Otherwise, please quote the relevant piece(s) of legislation

Answer Options	Response Count
	31
<i>answered question</i>	31
<i>skipped question</i>	6

A list of the links provided can be found below:

N°	Response Text	Country
1	http://www.pgrweb.go.cr/scij/Busqueda/Normativa/Normas/nrm_texto_completo.aspx?param1=NRTC&nValor1=1&nValor2=30431&nValor3=32130&param2=1&strTipM=TC&lResultado=10&strSim=simp	Costa Rica
2	http://www.apn.gob.pe/web/apn/mercancias-peligrosas	Peru
3	Ley 28256, Ley que regula el transporte terrestre de materiales y/o residuos peligrosos, Decreto Supremo No. 021-2008-MTC, Reglamento Nacional del Transporte Terrestre de Materiales y/o residuos peligrosos	Peru (land transport)
4	I cannot give the exact link, but they can be found in out official journal http://www.ejustice.just.fgov.be/cgi/welcome.pl	Belgium
5	The main regulation on inland and rail transport is available at http://www.antt.gov.br/carga/pperigoso/pperigoso.asp Also, there are others pieces of legislation at www.inmetro.gov.br (packagings) and, in the case of radioactive materials, at www.cnen.gov.br . RBAC 175 is the main regulation for air mode transport of dangerous goods http://www2.anac.gov.br/transparencia/pdf/RBAC%20175.pdf	Brazil
7	http://www.dziennikustaw.gov.pl/DU/2011/s/227/1367/1 - this act refers to RID/ADR/ADN, links to regulations on transport of dangerous goods are also provided on the following pages: http://www.mir.gov.pl/strony/zadania/transport/drogi/przewozy-drogowe/przewozy-	Poland

Questionnaire results

N°	Response Text	Country
	specjalne/towary-niebezpieczne/ or http://www.mir.gov.pl/strony/zadania/transport/kolej/przewoz-towarow-niebezpiecznych/	
8	http://www.bmvi.de/SharedDocs/DE/Artikel/G/Gefahrgut/gefahrgut-recht-vorschriften.html	Germany
9	https://www.e-tar.lt/portal/lt/legalAct/TAR.32E0A3FB18C4/cjNQTryBUx https://www.e-tar.lt/portal/lt/legalAct/TAR.2CD9AB1C25F7/TfnRVIBWnN	Lithuania
10	ADR https://www.lovtidende.dk/pdf.aspx?id=152738 RID http://www.trafikstyrelsen.dk/DA/Jernbane/Farligt-gods/RID/RID-2015.aspx	Denmark
11	http://www.fomento.es/MFOM/LANG_CASTELLANO/ORGANOS_COLEGIADOS/CCTMP/ULTIMA_HORA/	Spain
12	http://www.dsb.no/no/Ansvarsomrader/Farlige-stoffer/Transport/Oppdatert-regelverk-for-transport-av-farlig-gods/	Norway
13	LEY N° 28256 DECRETO SUPREMO N° 021-2009-MTC	Peru
14	http://www.ecfr.gov/cgi-bin/text-idx?gp=&SID=ff497e9fc72cf97687c7662916cc215c&mc=true&tpl=/ecfrbrowse/Title49/49chapterI.tpl	USA
15	http://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000020796240&categorieLien=id	France
16	SDR: http://www.astra.admin.ch/themen/schwerverkehr/00246/00408/index.html?lang=fr RSD: https://www.admin.ch/opc/fr/classified-compilation/20121700/index.html	Switzerland
17	Act 56 of 31st, January 2012 on Road Transport as amended ADR is fully valid in SR also for domestic transport and it is implemented in the Act 56/2012 of Coll of SR.	Slovakia
18	ACT 338 of 22 September 2000 on Inland Navigation and on Amendments of some Acts	Slovakia
19	www.imt-ip.pt	Portugal
20	for ADR approved by Low no. 31/1994 - there is a link on UNECE website - http://www.arr.ro/doc_353_Transport-marfuri-periculoase--ADR- pg_0.htm ADN approved by Law no. 159/2008RID approved by Government Ordinance no. 69/2001	Romania
21	ADR: 28 JUNE 2009. - Arrêté royal relatif au transport des marchandises dangereuses par route ou par chemin de fer, à l'exception des matières explosibles et radioactives ADN: 31 JUILLET 2009. - Arrêté royal relatif au transport des marchandises dangereuses par voie de navigation intérieure explosifs: 23 SEPTEMBRE 1958. - Arrêté royal portant règlement général sur la fabrication, l'emmagasinage, la détention, le débit, le transport et l'emploi des produits explosifs. (link: http://www.ejustice.just.fgov.be/cgi_loi/change_lg.pl?language=fr&la=F&cn=1958092301&table_name=loi) nuclear: Chapter VII of the Royal Decree of 20 July 2001 laying down general rules on the protection of the public, workers and the environment against the dangers of ionizing radiation (GRR-2001). Only available in French or Dutch: - French: http://www.jurion.fanc.fgov.be/jurdb-consult/consultatieLink?wettekstId=11617&appLang=fr&wettekstLang=fr	Belgium

Questionnaire results

N°	Response Text	Country
22	http://www.mt.public.lu/ministere/index.html	Luxembourg
23	http://likumi.lv/doc.php?id=220516 http://www.vvc.gov.lv/export/sites/default/docs/LRTA/Likumi/Law On the Handling of Dangerous Goods.doc http://likumi.lv/ta/id/116190-bistamo-kravu-parvadajumu-noteikumi http://likumi.lv/ta/id/74478-noteikumi-par-bistamo-kravu-parvadasanu-pa-dzelzcelu	Latvia
24	https://lovdata.no/dokument/SF/forskrift/2009-04-01-384	Norway
25	Wet Vervoer Gevaarlijke Stoffen and its Annexes (Law on Transport of Dangerous Goods and its Annexes).	Netherlands
26	For Great Britain: CDG 2009 as amended by CDG 2011. There are separate regulations for Northern Ireland. See links below: http://www.legislation.gov.uk/uksi/2011/1885/pdfs/uksi_20111885_en.pdf http://www.legislation.gov.uk/uksi/2009/1348/pdfs/uksi_20091348_en.pdf http://www.legislation.gov.uk/nisr/2011/365/pdfs/nisr_20110365_en.pdf	UK
27	RID-S: https://www.msb.se/externdata/rs/66703878-b6b0-4498-a03b-ccfd5c7bd7.pdf ADR-S: https://www.msb.se/externdata/rs/974f510a-4964-4c5e-b69c-ae96d32116b3.pdf	Sweden
28	http://laws-lois.justice.gc.ca/eng/acts/T-19.01/FullText.html https://www.tc.gc.ca/eng/tdg/clear-tofc-211.htm	Canada
29	National regulations: http://www.trafi.fi/tietopalvelut/vaaralliset_aineet/saadokset_ja_maaraykset	Finland
30	The Australian Code for the Transport of Dangerous Goods by Road and Rail and Australia's national Model Act on the Transport of Dangerous Goods by Road and Rail are available at the following link. http://www.ntc.gov.au/topics/safety/australian-dangerous-goods-code/	Australia
31	http://www.justiceservices.gov.mt/DownloadDocument.aspx?app=lom&itemid=9206&l=1	Malta

Comment:

Several respondents mentioned the willingness to provide the secretariat with more information, documents or links. A follow-up should be done.

Q.15. There is a general lack of statistics on a worldwide basis about the transport of dangerous goods by:

- Mode of transport
- Class of dangerous goods
- Dangerous goods packed in limited quantities
- National versus international transport
- Accidents involving dangerous goods during transport

Questionnaire results

Does your government collect national statistics concerning the transport of dangerous goods by:

- i) Road**
- ii) Rail**
- iii) Inland waterways**
- iv) Sea**
- v) Air**

If yes could you supply copies or a web link for the statistics:

This question was asked in the Governments and NGOs questionnaires please see the results below:

<u>Governments results</u>			
Answer Options	Yes	No	Response Count
i) Road	16	10	26
ii) Rail	18	7	25
iii) Inland waterway	9	16	25
iv) Sea	9	9	18
v) Air	9	10	19
<i>answered question</i>			22
<i>skipped question</i>			5
<u>NGOs results</u>			
Answer Options	Yes	No	Response Count
i) Road	2	20	22
ii) Rail	1	21	22
iii) Inland waterway	1	21	22
iv) Sea	1	21	22
v) Air	1	21	22
<i>answered question</i>			22
<i>skipped question</i>			5

Provided links for statistics on the transport of dangerous goods	
Country	link
USA	http://www.census.gov/econ/cfs/2012/ec12tcf-us-hm.pdf
France	http://www.statistiques.developpement-durable.gouv.fr/donnees-ligne/r/flux-marchandises-sitram-i.html
Switzerland	http://www.bav.admin.ch/themen/verkehrspolitik/00709/02277/02609/index.html?lang=fr
Denmark	http://www.danmarksstatistik.dk/da/search.aspx?q=farligt+gods
Romania	We encourage you to request the statistics to National Institute of Statistics - INS www.insse.ro
Belgium	See the information document on transport of radioactive material in Belgium. Only available in French or Dutch: - French: http://www.fanc.fgov.be/GED/00000000/3500/3539.pdf - Dutch: http://www.fanc.fgov.be/GED/00000000/3500/3538.pdf Inland waterways: Information available about classes of dangerous goods (1) oil and gasoline (2) chemical products and (3) explosives Road: information available about number of controls conducted
Lithuania	http://www.stat.gov.lt/en/home

Questionnaire results

Provided links for statistics on the transport of dangerous goods	
Country	link
Germany	https://www.destatis.de/DE/Publikationen/Thematisch/TransportVerkehr/Querschnitt/Gefahrgutransporte.html
Norway	https://www.ssb.no/statistikkbanken/SelectVarVal/Define.asp?MainTable=JernbGodsFarlig&KortNavnWeb=jernbane&PLanguage=0&checked=true https://www.ssb.no/statistikkbanken/SelectVarVal/Define.asp?MainTable=KvSafeSeaNet&KortNavnWeb=kv%5Fstatres&PLanguage=0&checked=true
Poland	<p>In rail/road/inland waterways transport data specified in the regulation on yearly report concerning the activities connected with the transport of dangerous goods (http://www.dziennikustaw.gov.pl/DU/2012/966/1) are gathered.</p> <p>Under the Parliamentary Act on transport of dangerous goods these data are gathered by the Office of Rail Transport (Urząd Transportu Kolejowego, Inland Waterways Offices (urzędy żeglugi śródlądowej), Inspectorates of Road Transport (inspektoraty transportu drogowego). As far as Maritime transport is concerned data on transport of dangerous goods are collected by Maritime Offices (urzędy morskie).</p> <p>As far as rail transport is concerned some of these data are presented in an aggregate form in yearly reports on rail transport safety available on the national safety authority http://www.utk.gov.pl/pl/bezpieczenstwo-systemu/monitoring/opracowania-dotyczace-b/3883.Opracowania-dotyczace-bezpieczenstwa.html.</p> <p>As far as other modes of transport are concerned the statistics are not published.</p>
Brazil	<p>This information is not published on internet for air mode, although we can supply you with some statistics. More than 750000 packages of dangerous goods were transported by air since January 1st of 2015 until today (79% of Class 9; 10% of Class 6; 4% of Class 3). There isn't any accident involving dangerous goods transported by air, although there were 60 incidents reported since January 1st of 2014 until today (26% undeclared; 44% regarding documentation; 17% regarding packaging) (Top 3 dangerous goods incidents reported are Class 3, Class 9 and Class 8). For road transportation, you can check at produtosperigososbrasil.com; www.ipr.dnit.gov.br; http://www.mma.gov.br/seguranca-quimica/emergencias-ambientais/plano-nacional-de-prevencao-preparacao-e-resposta-rapida-a-emergencias-ambientais-com-produtos-quimicos-perigosos</p>
Sweden	<p>http://www.trafa.se/en/Statistics/</p> <p>The available statistics are of a more general character. Concerning the air mode, we do not know what statistics that is available.</p>
Australia	<p>In September 2015, the Australian Bureau of Statistics will release a publication entitled "Road Freight Movements" (catalogue number 9223.0), which is expected to include, among other things, total tonnes of dangerous goods carried, total dangerous goods tonne-kilometres, and total kilometres travelled.</p> <p>The publication will be made available on the website of the Australian Bureau of Statistics. http://www.abs.gov.au/</p>
Norway	http://www.dsb.no/Global/Farlige%20stoffer/Dokumenter/1293-2013-elektronisk%20(2).pdf
Spain	<p>http://www.fomento.gob.es/MFOM/LANG_CASTELLANO/DIRECCIONES_GENERALES/T_RANSPORTE_TERRESTRE/MMPP/Estadisticas/</p> <p>For air, not available for the public.</p>
Peru	http://www.apn.gob.pe/web/apn/reportes-estadisticos-sobre-mercancias-peligrosas
Thailand	<p>There is only a one-time estimation of the data compiled by a German Expert, Mr. Manfred Zachzial on the Transport Information Database (TID) under the Thai-German Dangerous Goods Project during the year 1997-2003.</p>

Comment:

Several respondents mentioned the willingness to provide the secretariat with more information, documents or links. A follow-up should be done.

Questionnaire results

Statistics are also collected at EU level, refer to [http://ec.europa.eu/eurostat/statistics-explained/index.php/Road freight transport by type of goods](http://ec.europa.eu/eurostat/statistics-explained/index.php/Road_freight_transport_by_type_of_goods)

Q.16 : Is your country party to a convention/agreement governing international transport of dangerous goods by road, rail or inland waterways, OTHER than ADR, RID, ADN, SMGS?

Answer Options	Response Percent	Response Count
No	80.0%	28
Yes	20.0%	7
If Yes, please specify (Name and depositary)		8
<i>answered question</i>		35
<i>skipped question</i>		2

If Yes, please specify (Name and depositary)

Country	
Costa Rica	El país firmó solamente el Convenio de Basilea
Thailand	Protocol 9 of the ASEAN Agreement on the transport of dangerous goods across the borders based on UN RTDG and ADR
Peru	Convenio SOLAS y Convenio MARPOL. El libro naranja, MTC, MINSA-DIGESA
Brazil	The Agreement on the Rail and Road Transportation of Dangerous Goods on Mercosur
United Kingdom	English-French Intergovernmental Commission (IGC): Eurotunnel Safety Arrangements - Volume F
Canada	Unclear, the agreements are North American Specific. For example, for rail in North America, this is done through agreements with the Association of American Railways.
Finland	Bilateral agreement with Russia (Rail, dangerous goods)

Q. 17. Are the provisions of this agreement/convention consistent with those of the United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations?

Answer Options	Response Percent	Response Count
Yes	90.0%	9
No	10.0%	1
<i>answered question</i>		10
<i>skipped question</i>		27

Comment:

It is noteworthy that 90% of the reported agreements/conventions that are not ADR, RID, ADN, SMGS, contain provisions consistent with those of the United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations.

Questionnaire results

Q.18. If Yes, which edition? (18th to 12th). Previous edition (please specify)

Answer Options	Response Percent	Response Count
18th revised edition	50.0%	4
17th revised edition	12.5%	1
16th revised edition	0.0%	0
15th revised edition	25.0%	2
14th revised edition	0.0%	0
13th revised edition	0.0%	0
12th revised edition	12.5%	1
Previous edition (please specify)		2
<i>answered question</i>		8
<i>skipped question</i>		29

Comment:

One agreement (MERCOSUR) is still based on the 7th revised edition, which implies that a serious update should be highly recommended.

Q.28 Are you aware that the United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations are updated at two-year intervals?

Answer Options	Response Percent	Response Count
Yes	100.0%	35
No	0.0%	0
<i>answered question</i>		35
<i>skipped question</i>		2

Q.29 Do you think the two-year cycle of revisions is the correct interval?

<u>Governments results</u>		
Answer Options	Response Percent	Response Count
Yes	80.0%	28
No	11.4%	4
I do not know	8.6%	3
<i>answered question</i>		35
<i>skipped question</i>		2
<u>NGOs results</u>		
Answer Options	Response Percent	Response Count
Yes	70.8%	17
No	29.2%	7
<i>answered question</i>		24
<i>skipped question</i>		3
<u>IGOs results</u>		

Questionnaire results

Answer Options	Response Percent	Response Count
Yes	66.7%	4
No	33.3%	2
Do not know	0.0%	0
<i>answered question</i>		6
<i>skipped question</i>		0

If No, then is it:

<u>Governments results</u>		
Answer Options	Select one answer	Response Count
Too long	0	0
Too short	4	4
<i>answered question</i>		4
<i>skipped question</i>		33
<u>NGOs results</u>		
Answer Options	Select one answer	Response Count
Too long	1	1
Too short	6	6
About right	2	2
<i>answered question</i>		9
<i>skipped question</i>		18
<u>IGOs results</u>		
Answer Options	Select one answer	Response Count
Too long	0	0
Too short	2	2
<i>answered question</i>		2
<i>skipped question</i>		4

Governments results

80% of the respondents consider that the two-year cycle of revisions is the correct interval.

Among the 11.4% of those who replied “no” to this question, 100% considered the 2-year cycle too short.

8.6% did not know

NGOs results

70.8% of the respondents consider that the two-year cycle of revisions is the correct interval.

Among the 29.2% of those who replied “no” to this question, 19.47% considered the 2-year cycle too long, 6.49% consider it to be about right and 3.24% consider it to be too long.

IGOs results

66.7% of the respondents consider that the two-year cycle of revisions is the correct interval, while 33.3% of the respondents consider it to be too short

The overall conclusion is that the vast majority of respondents/stakeholders is satisfied with the current 2-year periodicity of amendments.

Questionnaire results

Q.31. The United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations are dealt with by the Committee of Experts on the Transport of Dangerous Goods (TDG) and on the Globally Harmonized System of Classification and Labelling of Chemicals (GHS) and its Sub-Committee on TDG. This leads to standard methods of classification, packaging, marking and labelling. They are then transferred to the individual modal bodies for adoption.

Do you consider the system works well? If your answer is No, please explain briefly your concerns

<u>Governments results</u>		
Answer Options	Response Percent	Response Count
Yes	88.6%	31
No	2.9%	1
I do not know	8.6%	3
If your answer is No, please explain briefly your concerns		1
<i>answered question</i>		35
<i>skipped question</i>		2
<u>NGOs results</u>		
Answer Options	Response Percent	Response Count
Yes	78.3%	18
No	21.7%	5
<i>answered question</i>		23
<i>skipped question</i>		4
<u>IGOs results</u>		
Answer Options	Response Percent	Response Count
Yes	100.0%	6
No	0.0%	0
If your answer is No, please explain briefly your concerns		0
<i>answered question</i>		6
<i>skipped question</i>		0

If your answer is No, please explain briefly your concerns

Governments' results

The governments' results reflect a general satisfaction with the way the United Nation system works (88.6%). Only one of the respondents raised an issue with intermodal differences in classification of dangerous goods indicating that ADN has some substance identification numbers different from ADR, but the secretariat is not aware of such differences except perhaps for carriage of liquids in bulk in tank vessels where specific ADN numbers have been assigned to substances not regulated under ADR.

Questionnaire results

NGOs results

78.3% of the respondents consider that the current system works well (i.e. standardisation of classification, packaging, marking and labelling at Committee level followed by transfer to the relevant provisions to the individual modal bodies for adoption).

21.7 % of the respondents consider that the system does not work well. This percentage includes the contribution of one respondent who answered “no” to the question although he/she specified in the comments that in his/her view the system works well as far as the modal bodies are concerned since they participate in a cooperative and constructive manner to the work of the Committee, transposing its recommendations into the legal instruments under their responsibility as soon as possible and providing feedback when necessary. On the contrary he/she felt that Governments are not so cooperative and efficient in implementing provisions for land transport.

The concerns expressed by those who considered that the system does not work well are as follows:

- Too much divergences remaining in modal provisions as well as in the way competent authority implement them (e.g. conscious deviation or time lag in transposing the Model Regulations)
- Dis-harmonization generated by non-respect of the procedure, i.e.: issues of global concern discussed first at regional level and once a decision has been taken regionally, brought to the attention of the Sub-Committee where the outcome of the discussions might be different.
- Too lengthy discussions on some issues.
- Duplication of discussions on the same issues in TDG and GHS sub-committees, which slows down significantly the decision-making process.
- Lack of efficiency of governments as regards the implementation of provisions for land transport.

Analysis/comments by the secretariat

As regards the question of avoiding duplication of work and enhancing cooperation between the TDG and GHS sub-committees, it is worth noting that both sub-committees addressed this issue in December 2014 and agreed to sharing meeting time (starting on July 2015) to discuss issues of common concern.

Opinions/guidance on how to address the remaining concerns:

- remaining divergences in modal provisions are often justified by safety concerns specific to one mode of transport. Past discussions on elaborating an international multimodal convention showed that governments had still diverging opinions on the need for such a convention;
- non-respect of the procedure It is true that some governments tend to raise some issues first at modal level (IMO, ICAO, or UNECE Joint Meeting) and this leads to problems. This practice should be avoided and modal authorities should exert proper discipline to ensure that issues that concern all modes be raised first at the level of the ECOSOC Sub-Committee of Experts on TDG;
- lack of efficiency of governments as regards the implementation of provisions for land transport This is a problem that occurs in countries that have not developed proper administrative mechanisms of follow-up to revisions of the UN Recommendations.

Questionnaire results

Q.32. Do you consider that the international regulations are up to date and relevant to the modern uses of and distribution of dangerous goods?

<u>Governments results</u>		
Answer Options	Response Percent	Response Count
Yes	91.4%	32
No	2.9%	1
I do not know	5.7%	2
If your answer is No, please provide examples of deficiencies		2
<i>answered question</i>		35
<i>skipped question</i>		2
<u>NGOs results</u>		
Answer Options	Response Percent	Response Count
Yes	68.2%	15
No	31.8%	7
<i>answered question</i>		22
<i>skipped question</i>		5
<u>IGOs results</u>		
Answer Options	Response Percent	Response Count
Yes	80.0%	4
No	20.0%	1
If you answer no please provide examples of deficiencies		1
<i>answered question</i>		5
<i>skipped question</i>		1

If your answer is No, please provide examples of deficiencies:

Governments' results

91.4% of the respondents consider that the regulations are up to date and relevant to the modern uses of and distribution of dangerous goods, while 2.9% answered "no" to that question.

Examples of general deficiencies given by those who answered "no" to the question are:

- In certain areas it may be considered to develop performance based provisions rather than very detailed provisions.
- Regarding technical development there is always a delay in adapting suitable provisions. This is of course frustrating for industry, but it is difficult to solve this problem with the current system.

NGOs results

68.2% of the respondents consider that the regulations are up to date and relevant to the modern uses of and distribution of dangerous goods, while 31.8% answered "no" to that question.

Examples of general deficiencies given by those who answered "no" to the question are:

- Packing instructions not keeping pace with packing technology

Questionnaire results

- Lack of enforcement capacity by some competent authorities to ensure the packagings are made in daily production the same as the units tested in the design qualification tests.

Examples of more nature or modal specific deficiencies given by those who answered “no” to the question are:

- Lack of non-testing criteria to assign packing groups to mixtures in Class 8
- Lack of provisions addressing combustibility
- Lack of full recognition of new developments (such as document digitisation) by all contracting parties to ADR??.
- Lack of recommendations for a harmonized explosives security marking
- Outdated provisions for the transport of fishmeal

IGOs results

80 % of the respondents (4) consider that the regulations are up to date and relevant to the modern uses of and distribution of dangerous goods, while 20% (1) answered “no” to that question.

Comments of general deficiencies given by the respondent who answered “no” to the question indicated a need for better alignment with current consumer trends in online ordering, in particular the need for exemptions of minimal quantities of dangerous goods.

Q.33. The UNECE Transport Division in Geneva provides secretariat services to ECE TDG bodies namely WP15 for ADR, the RID/ADR/ADN Joint Meeting and WP15/AC.2 for ADN. In addition, they provide secretariat services to the ECOSOC TDG and GHS committee and its sub-committees. Do you consider the secretariat functions/works well?

<u>Governments results</u>		
Answer Options	Response Percent	Response Count
Yes	82.9%	29
No	5.7%	2
I do not know	11.4%	4
If not, could you please identify weaknesses and supply details		4
<i>answered question</i>		35
<i>skipped question</i>		2
<u>NGOs results</u>		
Answer Options	Response Percent	Response Count
Yes	100.0%	22
No	0.0%	0
<i>answered question</i>		22
<i>skipped question</i>		5

Questionnaire results

If not, could you please identify weaknesses and supply details

Governments results

82.9% of the respondents consider that the secretariat works well.

5.7% of the respondents consider that the secretariat does not work well.

11.4% of the respondents did not know.

Examples of general deficiencies given by those who answered “no” to the question are:

- Even the answer is yes, we consider a need to supplement the number of persons and the funds for transport of dangerous goods Section.
- Generally works well. Better documentation of discussions, resolutions, and evolution of files would be appreciated. Decisions are documented, but the rationale and discussions are lacking especially when changes or major points are raised in plenary.
- Several countries, mostly from Latin America claimed that they do not know of the work done by the UNECE secretariat.

NGOs results

100% of the respondents consider that the secretariat works well.

Additional feedback provided in relation to that question indicates the following:

- The service provided by the secretariat is outstanding
- The secretariat has a deep knowledge on the implementation of the Model Regulations through their involvement in UNECE modal bodies
- Weakness: lack of funding for outreach, particularly as regards countries which are not able to participate in the meetings

Comments from the secretariat

For the contents of reports, the secretariat has to comply with strict rules concerning the limitation of documentation, according to which only decisions should be recorded especially when the arguments, or the rationale of decisions can be derived from supporting documentation. A maximum of six pages of CRPs (2000 words) may be submitted for translation per day (maximum of 10500 words for the final narrative part of the report).

The few statements reflecting little knowledge of the work done by the secretariat came mainly from respondents of countries that do not participate in the work.

Q.34. Are the various publications from the UNECE Transport Division produced in a timely manner? I.e. are they available in good time for use by the regulators and industry?

<u>Governments results</u>		
Answer Options	Response Percent	Response Count
Yes	85.7%	30
No	2.9%	1
I do not know	11.4%	4
<i>answered question</i>		35
<i>skipped question</i>		2
<u>NGOs results</u>		

Questionnaire results

Answer Options	Response Percent	Response Count
Yes	100.0%	23
No	0.0%	0
<i>answered question</i>		23
<i>skipped question</i>		4

Q.35. Are the United Nations regulatory and capacity building exercises effective in spreading knowledge concerning dangerous goods transport?

<u>Governments results</u>		
Answer Options	Response Percent	Response Count
Yes	62.9%	22
No	5.7%	2
I do not know	31.4%	11
<i>answered question</i>		35
<i>skipped question</i>		2
<u>NGOs results</u>		
Answer Options	Response Percent	Response Count
Yes	75.0%	15
No	25.0%	5
<i>answered question</i>		20
<i>skipped question</i>		7
<u>IGOs results</u>		
Answer Options	Response Percent	Response Count
Yes	60.0%	3
No	40.0%	2
If No, please explain		3
<i>answered question</i>		5
<i>skipped question</i>		1

Q.36. Could more be done for example:

- **Providing written guidance on how the regulations work (note there is already a Road map for accession and implementation of ADR)?**
- **Providing training courses for government official and agencies on application of the various legal Instruments**
- **Other (please specify)**

Questionnaire results

<u>Governments results</u>			
Answer Options	Yes	No	Response Count
Providing written guidance on how the regulations work (note there is already a Road map for accession and implementation of ADR)?	18	5	23
Providing training courses for government official and agencies on application of the various legal instruments	23	3	26
Other (please specify)			7
<i>answered question</i>			27
<i>skipped question</i>			10

Governments results

62.9% of the respondents consider that the United Nations regulatory and capacity building exercises are effective in spreading knowledge concerning dangerous goods transport.

Analysis/comments by the secretariat

There is support to deploy additional resources to develop the following activities:

- Effective link between countries and the UNECE Transport Division.
- Providing study visits to the European countries that already applied the agreements to enable the developing countries to learn and see the actual practices from the best examples. The rules should be more promoted in developing countries.
- Providing guidelines concerning application of certain regulations based on positions agreed at the UNECE bodies meetings. In other words e.g. agreed understanding of regulations raising doubts which have been discussed under the point “Interpretation of RID/ADR/ADN” could be gathered in one place.
- It would be useful if the different language versions of the UN Model Regulations could be done earlier.
- Clear instructions on how to acquire relevant publications in existing languages versions.

<u>NGOs results</u>			
Answer Options	Yes	No	Response Count
Providing written guidance on how the regulations work (note there is already a guide on a Road map to accession to ADR and implementation)?	12	5	17
Providing training courses for government official and agencies on application of the various legal instruments	13	6	19
<i>answered question</i>			20
<i>skipped question</i>			7

NGOs results

75% of the respondents consider that the United Nations regulatory and capacity building exercises are effective in spreading knowledge concerning dangerous goods transport.

On the question “could more be done [by the United Nations] to spreading knowledge concerning dangerous goods transport”, there was similar support from the respondents to the 2 options provided as an example, i.e: development of written guidance on how the regulations work, and development of courses for government official and agencies on application of the various legal instruments.

Questionnaire results

Analysis/comments by the secretariat

Notwithstanding the fact that a majority of respondents seem satisfied with the effectiveness of the United Nations regulatory and capacity building exercises as regards spreading knowledge concerning dangerous goods transport, there is support to developing additional resources. The problems faced by the secretariat:

- Absence of clear mandate (institutional (ECE/ECOSOC)) to perform such activities, notably outside the ECE region;
- Lack of resources within the section for additional activities/developing guidance, training materials, publications, leaflets, etc.;
- Lack of time and travel budget for secretariat participation in workshops/seminars.

The secretariat could envisage possible available options (e.g.: e-publications for the website; revisiting information published; developing guidance..., or other suggestions) in the light of resources available.

IGOs results			
Answer Options	Yes	No	Response Count
Providing written guidance on how the regulations work (Note: Some material is already available on the UNECE website, such as Guiding Principles related to the UN Recommendations on TDG, GHS Guidance, GHS Presentations, Road Map for accession and implementation of ADR, Catalogue of questions related to ADN training)	4	2	6
Providing training courses for government official and agencies on application of the various legal instruments	5	1	6
Other (please specify)			2
<i>answered question</i>			6
<i>skipped question</i>			0

IGOs results

60% of the respondents (3) consider that the United Nations regulatory and capacity building exercises are effective in spreading knowledge concerning dangerous goods transport.

For one respondent it wasn't clear what was meant by "capacity building exercises" in the question while another indicated that he/she would have preferred to answer this question with "do not know" (same or different respondent?)

The need for additional capacity building activities in developing Member States was raised by one respondent, in order to develop a "safety culture" and to offset the effects of continuous changes in personal in Member States government departments.

On the question "could more be done [by the United Nations] to spreading knowledge concerning dangerous goods transport", there was similar support from the respondents to the 2 options provided as an example, i.e: development of written guidance on how the regulations work, and development of courses for government official and agencies on application of the various legal instruments.

Additional suggestions for improvement included:

- Providing translation of UN model Regulations as well as ADR/RID/ADN in all UN official languages to promote their implementation in non-EU countries and facilitate the use of correct translation and terminology used in other legal instruments prepared by other IGOs.
- Development of on-line training for regulatory bodies, with modules focusing on behavioural and safety culture development and explanations on how the different regulatory bodies function.

Questionnaire results

The commenter indicated that this is being developed in the IAEA for the transport of Class 7 using the IAEA SSR-6 transport requirements. This work would benefit from multi-agency funding which would then include reference to the Model Regulations and perhaps modal regulations.

Analysis/comments by the secretariat

The UN Model Regulations and the Manual of Tests and Criteria are already published in all UN official languages.

ADR and ADN are agreements administered by UNECE bodies and as such, issued in the three official languages of UNECE (i.e. English, French and Russian).

- ADR: <http://www.unece.org/trans/danger/publi/adr/adr2015/15contentse.html>
- ADN: http://www.unece.org/trans/danger/publi/adn/adn2015/15files_e.html

RID regulations are prepared by OTIF which issues them in the three official languages (English, French and German), see: <http://www.otif.org/>

However, it is worth noting that the European Union directive 2008/68/EC requires all EU member States to apply the provisions of ADR, ADN and RID which are international treaties applying to international carriage – also to domestic traffic, and as a consequence these provisions are available not only in English, French and Russian, but in all 24 EU languages, including Spanish which is an official UN language widely used outside Europe, and Portuguese also widely used in several non-European countries. The UNECE secretariat provides links to other linguistic versions through its website, see for instance for ADR: http://www.unece.org/trans/danger/publi/adr/adr_linguistic_e.html

As the working languages of the UNECE are only English, French and Russian, the secretariat cannot request the UN language services to provide translations of ADR in other UN languages, unless extrabudgetary resources are provided by interested parties.

As regards development of training, same comments as for NGOs.

The secretariat suggests also that experienced competent authorities could envisage, through the work programme of bodies such as WP.15, to provide guidance on specific issues related to effective implementation and enforcement of regulations, to the benefit of governments that do not possess such experience.

Q.37 Would your government/ organization or its members be prepared to contribute to a trust fund intended for financing UN extra-budgetary training/capacity building activities in countries that need support for implementation?

<u>Governments results</u>		
Answer Options	Response Percent	Response Count
Yes	0.0%	0
No	21.9%	7
I do not know	78.1%	25
<i>answered question</i>		32
<i>skipped question</i>		5

Questionnaire results

NGOs results		
Answer Options	Response Percent	Response Count
Yes	23.8%	5
No	76.2%	16
<i>answered question</i>		21
<i>skipped question</i>		6

Governments results

21.9% of the respondents are not prepared to contribute to a trust fund for financing UN extra-budgetary training/capacity building activities in countries that need support for implementation and 78.1% do not know.

NGOs results

23.8% of the respondents would be prepared to contribute to a trust fund for financing UN extra-budgetary training/capacity building activities in countries that need support for implementation.

Analysis/comments by the secretariat

The possibility to raise funds from governments and NGOs for developing training/capacity-building activities appears to be limited.

Q.38 Does your country need support for developing and implementing relevant national regulations for the inland transport of dangerous goods based on the United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations and related instruments?

Answer Options	Response Percent	Response Count
Yes	8.6%	3
No	77.1%	27
I do not know	14.3%	5
If yes, please specify		3
<i>answered question</i>		35
<i>skipped question</i>		2

Results

8.6% of the respondents consider that their country needs support for developing and implementing relevant national regulations for the inland transport of dangerous goods.

Examples of areas where help is requested:

- Implementation of the provisions for the inland, sea and air transport of dangerous goods.
- Training and capacity buildings to government officials and guidance on the installation of the infrastructure for the facilitation of the transport of dangerous goods and verification of compliance.
- Harmonization of provisions applicable to the transport of dangerous goods by different modes of transport.

No UNECE country expressed a need for support. The three countries expressing this need are non-UNECE developing countries. The secretariat has participated in several workshops and events on the subject of transport of dangerous goods and several countries from Africa, Asia and Latin America have expressed the need for support for the development and implementation of national regulations for the inland transport of dangerous goods. Unfortunately, these countries did not reply to the questionnaire.

Questionnaire results

Q.39. If yes, has your country ever sought support for this specific purpose from donor organizations, such as the World Bank, the Asian Development Bank, the African Development Bank, the Islamic Development Bank, the United Nations Development Account, EU Aid, US Aid and other countries' technical cooperation institutions?

Answer Options	Response Percent	Response Count
Yes	0.0%	0
No	54.5%	6
I do not know	45.5%	5
If yes, please specify		0
<i>answered question</i>		11
<i>skipped question</i>		26

Q.40. The various documents (United Nations Recommendations on the Transport of Dangerous Goods, Model Regulations, ADR, ADN as well as official meeting documentation) are published in more than one language although the majority of proposals are made in English. Do you consider official translations of the documents satisfactory?

<u>Governments results</u>		
Answer Options	Response Percent	Response Count
Yes	82.9%	29
No	8.6%	3
I do not know	8.6%	3
If No please provide some examples or general concerns you have		5
<i>answered question</i>		35
<i>skipped question</i>		2
<u>NGOs results</u>		
Answer Options	Response Percent	Response Count
Yes	91.3%	21
No	8.7%	2
<i>answered question</i>		23
<i>skipped question</i>		4
<u>IGOs results</u>		
Answer Options	Response Percent	Response Count
Yes	33.3%	2
No	33.3%	2
I do not know	33.3%	2
If No, please provide some examples or general concerns you have		2
<i>answered question</i>		6
<i>skipped question</i>		0

Questionnaire results

If No please provide some examples or general concerns you have

Governments results

82.9% of the respondents considered official translations of the documents satisfactory.

Among those who provided comments, the following issues were raised:

- Translation of documents should be made available earlier. Checking equivalence in technical language takes time and believes that the regulations would increase in value if delegations would have more time available before the session to verify the proposals
- In the end of the meetings, generally some parts of the English version of the report cannot be translated.
- Some errors in the translation force delegations to guess the meaning of the proposals.

NGOs results

91.3% of the respondents considered official translations of the documents satisfactory.

Among those who provided comments, the following issues were raised:

- Translators could be better trained on dangerous goods jargon (e.g., safety vs. security, material vs. substance, article vs. item, mark vs label, label vs placard, etc
- Late availability of translated versions of official documents for the meetings
- Different translations available for the same texts (e.g. UN official translation vs national translations in some countries)

Analysis/comments by the secretariat

The secretariat thinks that the comment on training translators on dangerous goods jargon might be related to interpretation during meetings rather than translation of documents. It is important to understand that UN translators and interpreters are involved in a very wide variety of subject matters and it is not possible for all of them to be specialists of terminology in all these areas. The UNECE Transport Division cooperates closely with the UN language services, but also those of IMO and ICAO, to try to ensure consistency in terminology used. The question of late availability of translations is indeed of concern and the UNOG Division of Conference Management is well aware of it, but they have to face multiple problems:

- limited translation capacity due to budget constraints that does not allow them to respond to the ever-growing demand (at the whole United Nations level);
- Difficulties to recruit translators who are competent in highly specialized areas of work;
- Irregular demands with high peaks at certain periods of the year.

IGO results

Answers were equally divided among those who considered that the translation of UN documents is satisfactory, those who considered it unsatisfactory and those who answered “I do not know”.

Those who provided comments suggested considering publishing the UN Model Regulations on the Transport of Dangerous Goods, as well as reports from meetings and its addenda in all UN official languages.

Analysis/comments by the secretariat

The UN Model Regulations and the reports of the Committee and its addenda are translated in all UN languages, at the request of ECOSOC. The reports of the Sub-Committee are issued only in the working languages (English and French). Translating these reports in all UN official languages would have significant budget implications for the Department for General Assembly and Conference Management that would have to be approved.

Questionnaire results

Q.42. Are there obstacles to your government's participation?

Answer Options	Response Percent	Response Count
Yes	53.3%	8
No	46.7%	7
If yes, please specify		9
<i>answered question</i>		15
<i>skipped question</i>		22

Results

8 out of 37 (21.6%) of the respondents to the questionnaire stated that there are obstacles to their government's participation. Travel budgets reductions and lack of financial funds were the main reasons cited.

Q.43. If you wish to make additional comments not covered by the questions, the consultant would be happy to receive them

Comments to be noted or that may need further consideration.

- The ADR developing countries, like ASEAN should get some technical supports from the experts from UNECE on how to set up the structure for this region, similar to UNECE WP.15. So, the members from the ASEAN countries can work and consider the level of implementation of ADR, etc.
- Au-delà des activités purement réglementaires, il nous paraît important de développer au niveau du secrétariat des outils permettant d'obtenir des données préalables aux décisions que prennent les différents groupes de travail. Notamment une base de données sur les accidents impliquant des transports de marchandises dangereuses nous semble à cet effet essentielle.
Dans le cadre du développement des outils de suivi télématique des transports, la CEE-ONU pourrait examiner la possibilité d'héberger certains serveurs. La mise en place de tels outils nécessite bien entendu un compromis au niveau des Parties contractantes.
- For the transport of radioactive material (dangerous goods of class 7), the input and the recommendations for the safe transport of radioactive material are issued by the IAEA (International Atomic Energy Agency) and discussed and prepared by the TRANSSC members (nominated by their Government), see:
- <http://www-ns.iaea.org/tech-areas/radiation-safety/transport.asp?s=3&l=23>
- <http://www-ns.iaea.org/committees/transsc/>
- In relation to the 2-year cycle of amendments, we suggest that new or amended text will only be included in the amendments to the UN TDG Recommendations, when the issue is finalized. If more discussion on a subject is needed, and more changes in the text is envisaged, the text should be kept as a working document for further discussion in the next biennium. (in the present situation, text just adopted by the modes has already been amended by the UN Subcommittee of Experts on TDG. This leads to a unnecessary burden and costs).
- Late INF papers on new subjects to the committee can be disruptive to preparations, especially for non-English speakers and those having to travel long distances. In such cases, it can mean that the comments of relevant experts have not been obtained in time.
- In view of the costs involved with the current meeting schedule (time, travel and hotels), could consideration be given to linking two of the four WP.15 sessions per biennium to the two Joint Meetings held in Geneva? And if this was found acceptable, perhaps consideration could then be given to following suit for rail and the Joint Meetings held in Bern?

Questionnaire results

- With the ICT advancements that have been made could consideration be given to enabling a competent authority or NGO which is not able to send a representative in person to instead take part electronically (as is the case with some informal working groups).

Questionnaire results

NGOs specific questions:

Q.23 Do you consider the services the UN provides to government and industry is widely recognised by companies and organisations involved in dangerous goods transport

Answer Options	Response Percent	Response Count
Yes	72.7%	16
No	27.3%	6
<i>answered question</i>		22
<i>skipped question</i>		5

Q.28 Are you aware of any conflicts between the UN transport of dangerous goods system and other regulations not the responsibility of the UNECE e.g. customs, general safety regulations from other agencies e.g. EU, OSHA?

Answer Options	Response Percent	Response Count
Yes	34.8%	8
No	65.2%	15
<i>answered question</i>		23
<i>skipped question</i>		4

Q.29 If so can you give any examples?

Results

65.2% of the respondents were not aware of any conflicts between the UN transport of dangerous goods system and other regulations not the responsibility of the UNECE (e.g. customs, general safety regulations from other agencies e.g. EU, OSHA)

Among those who replied “yes” (34.8%) the following issues were raised:

- Differences in the classification results:
 - goods classified as hazardous for supply and use but not for transport under different regulatory regimes
 - different classification criteria remaining in some countries for different sectors (e.g. USA criteria for flammability used by OSHA, NFPA and DOT)
- Need for further alignment of GHS and TDG provisions (e.g. terminology)
- Need for further coordination between customs and agencies responsible for security and safety in some countries (e.g. as regards advance information related to the transport of cargo)
- Requirements in the EU Transportable Pressure Equipment Directive (TPED) that impede the global movement of UN pressure receptacles (“Pi marking”)
- Potential conflict with the EU over security marking of explosives;
- Inconsistencies between national and international rules
- Effect of decisions of the European Food Safety Agency on current provisions applying to the safety of transport of fishmeal.

Questionnaire results

Analysis/comments by the secretariat

- Differences in classification results being addressed by the GHS SubCommittee (mention development of a harmonized list of chemicals classified according to GHS criteria)

Several issues raised are in fact being currently addressed. The fact that certain national or regional legislations continue to contain deviations from the provisions of the UN Model Regulations, especially legislation applicable to inland transport, remains obviously a problem for the industry as this may affect in particular the last leg of an international multimodal transport operation. Governments should refrain from introducing deviations or should include in their national rules provisions such as those contained in 1.1.4.2 of RID/ADR/ADN to facilitate such international transport operations.

Q.32 Can your organization provide any relevant data of interest to the evaluation of the economic impact of the UN Recommendations on the Transport of Dangerous Goods or ADR or ADN? (e.g. packaging, tank, vehicle, vessels markets)

Comment:

Several respondents mentioned the willingness to provide the secretariat with more information, documents or links. A follow-up should be done.

Questionnaire results

IGOs specific questions:

Q.6 Overall, do you consider the UN system works well:

Answer Options	Yes	No	Response Count
For your organisation	6	0	6
For the committees you service	6	0	6
For the regulations you produce	6	0	6
If not, please explain			0
<i>answered question</i>			6
<i>skipped question</i>			0

Note: If your organization is not aware of this system, but it would be interested in knowing more about it or in establishing liaison with the relevant United Nations bodies, please provide the name and contact details of the relevant person/department.

- One organization requested information and expressed interest in establishing a liaison with relevant United Nations bodies. This answer seems to be linked to lack of awareness of new staff in the organization since liaison with the organization in question has been efficiently established for many years.

Q.11. Do you think the Model Regulations should be further elaborated to address aspects which are not currently addressed, e.g. mode specific aspects? If your answer is Yes, please explain and indicate for which mode(s) of transport

Answer Options	Response Percent	Response Count
Yes	33.3%	2
No	66.7%	4
If your answer is Yes, please explain and indicate for which mode(s) of transport		1
<i>answered question</i>		6
<i>skipped question</i>		0

Results

66.7% of the respondents did not see the need for the Model Regulations to address aspects which are not currently addressed. One respondent (33.3%) however, considered that a “model training curricula” should be included in the Model Regulations to facilitate standardization of training curricula developed by competent authorities.

Q.14 The timing of meetings held in Geneva, particularly those under the auspices of ECOSOC do not necessarily align with dates of your organization meetings. Is this an inconvenience?

Answer Options	Response Percent	Response Count
Yes	33.3%	2
No	66.7%	4
Do you consider that some attempt at closer alignment should be made? If so how?		2
<i>answered question</i>		6
<i>skipped question</i>		0

Questionnaire results

Do you consider that some attempt at closer alignment should be made? If so how?

Results

66.7 % of the respondents (4) consider that the current timing of meetings is convenient. 2 respondents (33.3%) considered it to be inconvenient, and suggested as measures for a closer alignment: on-line calendar and shorter and/or less frequent meetings

Analysis/comments by the secretariat

The timing of meetings is indeed a problem. The secretariats of UNECE, IAEA, IMO and ICAO do their best to cooperate to avoid overlapping, but they have to take account also of the overall schedule of meetings and availability of rooms and interpretation services within their own organization, which makes the exercise particularly difficult. The IAEA has developed an online calendar of meetings for use by organizations involved in the “Interagency Advisory Group” (IAEA, UNECE, IMO and ICAO) which is useful, but sometimes the information cannot be provided in due time because it is depending on the final decision of the respective conference services of each organization and “tentative” dates are not always reliable.

Regarding reductions, the shortening of the duration of meetings is envisaged whenever possible, but so far only for sessions of WP.15 or of the ADN Safety Committee and in the light of the number of pre-session documents submitted by the deadline. The option of reducing the number of sessions of WP.15 and of the RID/ADR/ADN Joint Meeting has also been proposed by the secretariat to these bodies but it has been rejected.

Q.16 Does the UNECE secretariat provide you with relevant support for facilitating implementation of the UN Recommendations by your organization and cooperation between your organization and UN or UNECE intergovernmental bodies?

Answer Options	Response Percent	Response Count
Yes	100.0%	6
No	0.0%	0
If not, could you please identify weaknesses? Please supply details		1
<i>answered question</i>		6
<i>skipped question</i>		0

Q.21. If any person wishes to make additional comments they will be gratefully received

- The IAEA has conducted a survey of available accident data for Class 7 and found very few records. The purpose was to provide evidence that the current performance criteria for transport package designs is appropriate as Type B packages are designed to retain their contents under transport accident conditions. What will be needed is a global survey with member States requested to collect data on accidents which is designed not to be too onerous; eg did the accident involve a fire, did the packaged dangerous goods leak, what class of DG was involved, did the consignment meet all regulatory requirements, etc.
- Now that the UN has completed a large body of work on restructuring and developing packing instructions, the issue of lengthening the periodicity should be revisited. I believe a strong argument could be made to have a major revision every four or six years with either a minor revision every two years OR keep the longer cycle but have

Questionnaire results

a mechanism to allow for an urgent, safety based need to implement such amendments.

Analysis/comments by the secretariat

For the first comment, the development of such an accident database is under discussion in relation to the activities of the Joint Meeting.

For the second comment, this is related to the question of working cycles (Q.29) and the conclusion of the vast majority of stakeholders (governments, IGOs and NGOs) is that the current 2-year periodicity of amendments is satisfactory.