

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

2 September 2011

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

Geneva, 13-23 September 2011

Item 7 of the provisional agenda

Reports of informal working groups

Comments on proposals on the scope of the data set to be transmitted automatically (see documents ECE/TRANS/WP.15/AC.1/2011/35 and INF.8)

Transmitted by the Government of Netherlands

Summary

- In the context of the ongoing development of electronic data traffic, the Netherlands recognizes the importance of the EC proposal. We consider the initial response to an accident involving dangerous goods to be a purpose for which making prescriptions for the use of telematics would be desirable.
- However, we prefer to have some questions answered before a data set for any purpose is proposed for inclusion in the regulations. The contents needed in any message to be transmitted depend upon the purpose and intended users of the message. These have not yet been identified.
- We suggest that the Working group on telematics works towards identifying preferred purposes and users for telematics applications in dangerous goods transport.
- If a data set should be prescribed, we propose that an identification of purpose and intended users of the identification message accompany the proposed data set. The data set can then be limited to those data relevant for the intended users and purpose.

Introduction

1. The European Commission proposes in document 2011/35 to prescribe a set of data for the identification of dangerous goods during transport for any telematics applications. The Government of Germany proposes in document INF.8 different options for a set of data to be used as an identification message.
2. The HeERO project is a pre-deployment pilot for the eCall system, testing the options of adding dangerous goods data to the eCall emergency message. Especially the organization of providing, updating and exchanging information is tested. CEN/TC 278/WG15 has introduced a set of data for the purpose of use in this pilot. The HeERO pilot is planned to start in 2012.
3. On Monday, September 12, 2011, a joint meeting will be held of the working group on telematics and CEN/TC 278/WG15 to clarify the scope of the data set to be transmitted.

Position 1: No regulations yet

4. In the context of the ongoing development of electronic data traffic, the Netherlands recognizes the importance of the EC proposal. We consider the initial response to an accident involving dangerous goods to be a purpose for which making prescriptions for the use of telematics would be desirable.

5. However, we prefer to have some questions answered before a data set for any purpose is proposed for inclusion in the regulations. The contents needed in any message to be transmitted depend upon the purpose and intended users of the message. These have not yet been identified.

6. The Working group on telematics has identified the information that is required according to the regulations and that might benefit several parties involved in the transport of dangerous goods. The who-does-what matrix identifies parties that could use this information and to what end they use this information. However, the table does not indicate to which purposes and for which users the use of telematics applications is preferred to transmit information.

Position 2: Questions to be answered

7. We suggest that the Working group on telematics works towards identifying preferred purposes and users for telematics applications in dangerous goods transport.

8. The Working group on telematics could address the following questions:

a. For which purpose(s) is it necessary to make regulations for telematics applications?

In order to answer this question, a cost benefit analysis will be necessary as well as analyses of feasibility and consequences of implementation.

b. If regulation is necessary, must it prescribe the method and / or contents of information exchange? Or must it merely make it possible that freight forwarders use telematics systems instead of paper documentation for information on dangerous goods?

c. If prescription of method and / or contents of information exchange is considered necessary, which parties are the primary users of which information?

Position 3: Our position

9. If a data set should be prescribed, we propose that an identification of purpose and intended users of the identification message accompany the proposed data set. The data set can then be limited to those data relevant for the intended users and purpose.

10. As stated above, we consider the initial response to an accident involving dangerous goods to be a purpose for which making prescriptions for the use of telematics would be desirable. The users, in this case, are the persons receiving the emergency call and the first responders.

11. The HeERO pilot is directed towards this purpose. It aims at testing the inclusion of dangerous goods data in an eCall message. The main challenge for the pilot is to bring together automotive industry, telecom providers, call centers, rescue services and road authorities to achieve this.

12. The HeERO pilot will be carried out using the technology now available for the eCall system. This technology limits the amount of data that can be included in the emergency message. The set of data proposed by CEN/TC278/WG15 must therefore be looked at in the context of the pilot.

13. It seems reasonable to assume that the contents of ADR/RID/ADN are available or can easily be made available to emergency responders or emergency call center operators. Therefore, for the purpose of initial response, to identify the good or goods transported, it is sufficient to include a minimum of data. It appears to us that UN number and packing group for each substance transported will be adequate.

14. In addition, contact data will be needed in order to obtain any additional information from the party responsible for the transport.
