Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods   **9** 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 documents 2011/35, INF 8 and INF23

Transmitted by the Government of France

Summary

1. In documents 2011/35 the European Commission proposes a rule for defining a minimum set of data in order to identify dangerous goods in telematic applications.

2. Comments are made in documents INF8 and INF23 on how far these data are appropriate to be included in Ecall

3. These to issues are not automatically linked and should be discussed separately.

4. The definition of data necessary to identify one good without uncertainty is a very general issue that bnered to be clarified for any future telematic development in a harmonized way between the modes

5. Of course this should also be adapted to emergency response application like Ecall which is part of the foreseen development. But only a part of it. Therefore this work should not be limited from the very beginning by the intrinsic limitations of Ecall

6. Therefore this paper will comment on different subject that are mixed in the above mentioned documents and should not:

   a) minimal data set to identify a dangerous good in general

   b) On data necessary in emergency situation

   c) On cooperation with other organisation working on telematic

On the minimal data set to identify a dangerous good in general

7. After sorting out all the different cases in the dangerous goods list we can state that in order to define a dangerous good and its associated transport conditions the following is necessary depending on the cases:

   a) The UN number is necessary in all cases

   b) When a packing group has been assigned the packing group and the UN n° allow to identify the good

   c) Because RID/ADR has introduced additional conditions such as the vapour pressure to some goods when this happens and additional information is necessary that is in most

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case a reference to SP 640 but sometime the only way to distinguish is to refer to the classification (see UN3375);

d) When no packing group is defined, another second data is necessary which is either the complete list of labels in column (5) or the classification code.

8.   In conclusion not all the data listed in document 2011/35 are necessary. One dangerous good is identified by two or three data, however these are not always the same and must be chosen as appropriate from (1)the UN number; (2)the packing group; (3)the labels; (3)a special provision; (4)the classification code.

9.   The transport document contain more information in the defined sequence. This illustrates how telematic may simplify thing because these can be generated automatically by the system.

On data necessary in emergency situation

10.   The description of the goods is not the only relevant information that should be available for emergency responders. as Germany points out in documents INF8. And in our view one should expect to get for each good present in the load:

– the description of the goods (categorized as mentionned above)

– The quantity of the goods

– the way they are conditioned (tanks packaging which type...)

– additionally it is very useful to know the consignor or consignee when very specific goods are carried and specific advice is needed.

11.   In addition this shall harmonized between the modes as far as possible (some information will be specific indeed) because emergency response alert is appropriate for all type of accident and it would be very confusing for emergency responders to get different types of information

On cooperation with other organisation working on telematic in general and the work going on in the telematic WG

12.   Telematic is a very popular subject, and indeed a very interesting and possibly very useful new technology. Many organisations are working on developing these tools and often want to include dangerous goods in their systems. In the past this has led to dispersion and finally failure to conclude.

13.   The joint meeting has become aware of that and has given a mandate to a telematic working group in 2007. This mandate has been subject to lenghty discussions and has necessitated a three days working group to;be drafted. The European commission has strongly supported this mandate and is responsible for the drafting of most points mentioned in its annex. The terms of reference for this group are in document (ECE/TRANS/WP.15/AC.1/108/Add.3)

14.   This group has done the work of analysing the needs of dangerous goods operators and authorities. Given the fact that the best expertise for all modes of transport concerning dangerous goods is concentrated in our meetings. However our groups are lacking expertise in the building and modelling of electronic systems.

15.   The terms of reference include points on cooperation with other organisation. And it appears fortunately that most of the organisations that are working on telematic have the expertise that is complementary to ours. Therefore this cooperation should be based on

finding concrete solutions to answer the needs that the joint meeting has identified and not redefining this needs.

16. In document INF 23 the Netherlands propose a certain number of working directions which are in fact already covered by the terms of reference, but in a more limitative way. We do not support this approach. Limitation of the terms of reference shall be presented in a specific document with due justification.

17. Concerning cost benefit analysis these are also foreseen in the terms of reference but will only be possible once all the option and associated technical cost will be identified.

On the cooperation with Ecall work

18. We welcome this cooperation very much and see it as a way to built technical solution to answer one particular need identified by the telematic working group.

19. However some proposal aim at defining these needs according to the performance of the Ecall system which can only send a limited amount if information.

20. We consider that this is not the proper way forward.

21. The needs shall be defined according to the reality, then it shall be verified how far the technical systems that are envisage are able to comply. If they are not able to fulfil all the needs alternatives or improvements shall be looked for.

22. In particular the working group has also looked at the issue of electronic documentation issues that are able to transmit enough data. So maybe the way out is to verify how Ecall is able to create a link with these systems. If this is possible only a short reference to this link needs to be sent.

23. At this stage we do not think it is appropriate to limit the work in such a way the door will be closed in the future to other interesting developments.

24. We expect the Monday working group to provide a clarification of these points to avoid future misunderstandings.

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