

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Working Party on the Transport of Dangerous Goods

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Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: new proposals

Comments on document ECE/TRANS/WP.15/AC.1/2010/55 (CTIF)

Transmitted by the Government of Switzerland

Specialized personnel within the Swiss centre of expertise in protection against nuclear, biological and chemical (NBC) threats and hazards (SPIEZ LABORATORY) have been consulted. NBC protection refers to all measures to defend against and prevent nuclear, biological threats and hazards. In addition the Swiss Fire brigade Coordination agency (FKS) examined the proposal. All expressed unanimously a doubtful opinion concerning the proposal by CTIF. Following aspects are especially questionable:

1. The EAC is formulated in a very general way. Before any intervention, the substance has to be checked up anyway. ERI-Cards or Hommel give enough information; additional codes bring rather confusion than help. In addition, the hazard identification number (HIN) gives information about the danger. When examining the code list we found out that some of them didn't reflect the real danger of the products, for example there is no way to distinguish between very toxic products by ingestion from those been very toxic by inhalation (see document ECE/TRANS/WP.15/AC.1/2009/35).
2. It is up to the officer-in-charge to decide how to conduct the emergency action. We consider it as not pertinent and not useful to proceed according to a code in case of a chemical accident.
3. Emergency services do actually know how to protect themselves. Fire protection equipment incorporates, if needed, breathing protection. Additional protective equipment can be used in special situations which can be assessed only by a specialist and ordered by the officer-in-charge. Apart from that, the degree of protection always depends upon the nature of the event and the conditions such as assignment of emergency services, distance to the object, time of exposure, etc.
4. We consider the assertion in paragraph 12 as quite critical: according to the authors introducing EAC would make it possible for emergency responders not to have a detailed knowledge of chemistry. Does it mean: first action then thinking?
5. We consider that this proposal transgresses an important principle, which consists of giving full responsibility to the emergency responders during the accomplishment of their mission. As an example let us suppose that three persons are injured during an action despite the correct application of the EAC. Who is responsible: the EAC or the officer in command?

6. We consider using from a retrospective point of view solely one example of a chemical accident (Schönebeck) in order to highlight the advantages of the EAC as inconclusive. The substance involved in this accident was apparently UN 1086 VINYL CHLORIDE, HIN 239. Precisely this substance is in the present form not covered by the EAC.

7. The author writes in annex II "It is interesting to note that the firefighters in this incident were at risk from toxic vapours but this would not have been identified from either the danger label or the HIN but would have been from the EAC". In each basic course instructors repeat the principle that fire brigades must always be aware of the risk of toxic gases. Furthermore not only HIN-codes give wrong information about the toxicity by inhalation, also the proposed EAC-codes are wrong. For example by UN 1135, UN 1510 and UN 1541 the number "8" meaning "No Public Safety Hazard" appears in the EAC-code. Although these products are toxic by inhalation. In such a case we would expect the number "9" meaning "Public Safety Hazard". In addition for UN 1510 the letter "L" meaning "Liquid-Tight Chemical Protection Suit" is used, although this product is toxic by inhalation and the letter "N" or "Q" would be more appropriate, like in the case of UN 2480.

8. We consider the distinction – Public Safety Hazard / No Public Safety Hazard – of EAC useless in reality. Emergency responders have to protect themselves as well as possible. EAC 6 to 9 bring confusion with regard to responsibility. A general indication allowing to dilute or to contain a spillage cannot be given without considering the whole nature of the event and the local conditions.

9. We consider the existing system with the UN and the hazard identification numbers as sufficient although it should be revised by the CTIF in order to integrate the state of the art regarding the known dangers of the products, like for example the Toxic by Inhalation characteristics of the following UN entries: 1092, 1098, 1135, 1143, 1163, 1182, 1185, 1238, 1239, 1244, 1251, 1510, 1541, 1580, 1595, 1605, 1647, 1670, 1695, 1752, 1809, 1810, 1834, 1838, 1892, 1994, 2232, 2334, 2337, 2382, 2407, 2474, 2477, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2521, 2605, 2606, 2644, 2646, 2668, 3023, 3079, 3246, 3381, 3382, 3383, 3384, 3385, 3386, 3387, 3388, 3389, 3390.

10. In conclusion, the proposed extension with the additional code does not enhance safety and is difficult to apply.
