

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

12 September 2014

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

Geneva, 15-19 September 2014

Item 8 of the provisional agenda

Future work

Comments on: ECE-TRANS-WP15-AC1-2014-GE- INF16e: Roadmap on risk management in the context of inland transport of dangerous goods, transmitted by the European Railway Agency (ERA)

Transmitted by AEGPL

AEGPL fully supports the work and initiatives of ERA in Risk Management in the context of inland transport and believes that a “Risk based approach” and common “Risk acceptance Criteria” are key to allow credible risk based decisions especially as regards TDG’s

This work is also particularly important, as already expressed previously and especially during the last Bleve Prevention Working Group Meeting of April 2014 in Paris, since AEGPL strongly believes that:

Risk based approaches can help to provide *guidance* on the size of the risks and lead to a *prioritisation* of options to control it.

For this reason, it should be clear that:

The collection of accidents and incidents data is KEY for the process.
Making decisions without a Risk based approach and model and without data can be incomplete and risks in selection of less effective measures and risks in utilizing valuable resources where they are not mostly needed

Finally, AEGPL asks that the below key basic principles and related works of the:

European Accidents Data Base (see ECE/TRANS/WP.15/AC.1/2014/52) and
Risk-based decision-making (see INF.16)

to be fully supported by the delegates and to be seriously considered and be taken into account in the discussions of the Bleve Prevention Working Group.
