

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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

Geneva, 15-19 September 2014

Item 6 of the provisional agenda

Report of informal working groups**Comments on document ECE/TRANS/WP15/AC1/2014/53
and related INF documents (INF25 INF37 INF42 INF43)****Transmitted by the Government of France**

1. France has participated to all sessions of the BLEVE working group. We think that some comments related to this issue are the result of misunderstanding.
2. France would like to recall that the working group has extensively worked on risk assessment and has spent more time on this subject than it has on the Issue of thermal coating.
3. Nevertheless the risk assessment performed up to now did not allow to answer the relevant questions and did not help to make decisions, although AEGPL dedicated some budget for it, because the fundamental data that would make this approach meaningful were missing.
4. To perform a meaningful risk assessment at the following is needed:
 - a) Precise data on accidents that happened to dangerous goods vehicles including those with no dangerous goods consequence (leakage ...)
 - b) Precise data on the traffic that are coherent with the accident data in order to assess frequency
 - c) A precise and harmonized way to evaluate consequences of an accident
 - d) A precise evaluation of the efficiency of each safety barrier that is envisaged to avoid the accident.
5. In addition to that, once the risk has been evaluated, to make a decision on the advisability to adopt a measure as a group, a commonly agreed acceptability criteria is needed.
6. The BLEVE working group dedicated its two last session to verify the efficiency of two measures: safety valves and coating. This assessment required some testing as described, and is by itself a technically complicated matter. However the research program demonstrated that it is possible by combining these measures under specified conditions to build a tank that will not "Bleve" in a fire or delay the occurrence of a BLEVE in a significant manner. These are facts and there is hard evidence for it. This can be used as a decision criteria alone or can be related to point 4d) as part of a more global process.
7. What has to be further clarified are the detailed specifications to be met and standardized, and how to meet them. These are listed in paragraph 12.
8. France does not understand that the joint meeting has to commit, at this point to adopt any of the described measures. But because of the complexity and amount of work that is needed the group is seeking for some confirmation to continue to work in that direction. However one needs to be consistent because once the answers will be given and some measures (including all the other measures listed in former report of the working) are proven to be efficient, feasible and ranked in a

good position in a comparative study there will be no reason to differ their adoption. Thus the work on risk assessment and the work on each specific measure are not opposed but complementary.

9. In addition we want to point out that there are several other item of work that are undertaken in the frame of the joint meeting that are very important to meet the conditions for a relevant risk assessment mentioned in point 4. These are:

a) The initiative promoted by the secretariat and France to develop an international accident database.

b) The work on the development of a risk assessment tool (see document INF 16 by ERA)

10. France would like to add that it is also necessary in addition to these two points to think about a way to collect traffic data and in particular to include this item in the work on “telematic” systems.

11. AEGPL has rightly pointed out that it is highly desirable to continue to work intensively on these two subject and we totally agree with them. And we would like to reiterate our thanks to them for having consistently and constantly supported our initiative on the development of an accident database. We totally share this view but do not oppose it to the continuation of the work on the efficiency of coatings and safety valves.

12. However we consider that consistency in our work is a major factor to its credibility. Therefore we are of the opinion that any request for justification, of any proposal, by risk assessment, coming from a delegation that does neither support nor participate to the two working item mentioned in paragraph 9 above cannot be taken seriously.

13. Furthermore quantitative risk assessment may be a good tool for helping to make a decision. However, until the working group dedicated to this item has not produced a methodology that can be assessed and accepted by the joint meeting and its associated bodies (WP15 and RID committee) as meeting all the conditions specified above, we believe it is better to work on the basis of the current more qualitative method, that has, up to now, proven its efficiency in keeping the regulations up to date with technical progress an evolution of industry practice and needs This is proven by both the globally good safety records and the efficiency in facilitating transport operations.

14. Some elements of quantitative assessment may be integrated in this qualitative approach, and that has be done, but we have first to agree collectively on their parameters.

15. Finally we would like to recall that ultimately in the international agreements the way decisions are taken are described, as well as in the rules of procedures. They are made by governments accountable in front of their population as part of a democratic process and shall not be completely depending upon some automated risk calculation. We also agreed to base our work on the UN model rules where the following principle is stated:

“4. Transport of dangerous goods is regulated in order to prevent, as far as possible, accidents to persons or property and damage to the environment, the means of transport employed or to other goods. At the same time, regulations should be framed so as not to impede the movement of such goods, other than those too dangerous to be accepted for transport. With this exception, the aim of regulations is to make transport feasible by eliminating risks or reducing them to a minimum. It is a matter therefore of safety no less than one of facilitating transport.”

It is worth to note that even the feasibility in this principle is not related to a low cost but to social acceptance. This acceptance is linked to a level of risk that is as low as possible and not within a predefined limit.