

**OTIF**



**ORGANISATION INTERGOUVERNEMENTALE POUR  
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES**

**ZWISCHENSTAATLICHE ORGANISATION FÜR DEN  
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**INTERGOVERNMENTAL ORGANISATION FOR INTER-  
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Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods  
(Geneva, 13 - 23 September 2011)

**Agenda item 7: Reports of informal working groups**

**Informal Working Group on "Telematics" – Establishing the identification of dangerous  
goods for use with telematics applications**

**UIC and CIT comments on document OTIF/RID/RC/2011/35 – ECE/TRANS/WP.15/AC.1/2011/  
35 from the European Commission and informal document INF.8 from Germany**

**Introduction**

1. In document OTIF/RID/RC/2011/35 – ECE/TRANS/WP.15/AC.1/2011/35, the European Commission requests that identification be determined for dangerous goods to be carried in domestic traffic for the purposes of telematics applications. This identification is then to be implemented in practice in rail traffic by means of ERA technical documents in conjunction with the TAF TSI.
2. In document INF.8, Germany is calling for a decision to be taken concerning the contents and scope of the data set of an automatic emergency message in future eCalls for heavy goods vehicles so that the relevant (standardisation) bodies can take this into account in their future work.

**Comments**

**A. Concerning the contents of the "Identification message"**

3. The data proposed by the European Commission for the "Identification message" and their sequence partially contradict the current RID rules (Chapter 5.4).

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Examples:

- The hazard identification number – assuming such a number is prescribed (!) – must precede the UN number and not vice versa.
  - The classification code is only to be indicated for Class 1.
4. Were we to apply the Commission's proposal, the details in the consignment note would not match the data in the identification message. In UIC and CIT's view, the identification message should be based exclusively on the present contents of the consignment note in accordance with Chapter 5.4 in order to avoid adaptation costs (see also the statements from Germany on this subject in informal document INF.8).

#### **B. Concerning the implementation of telematics in the TAF TSI**

5. Telematics solutions should have to comply with the same requirements as "paper-based" solutions. We should avoid introducing more challenging requirements for telematics since this will make the transition to telematics solutions all the more difficult.
6. As things stand, the high availability requirements associated with the use of electronic solutions for dangerous goods (a safety-critical domain) will already incur high costs. In order to benefit from the indisputable advantages offered by telematics solutions in carrying dangerous goods safely, no further barriers to transition should be erected.
7. When carriers migrate their processes to electronic communications, all other parties (infrastructure companies, fire brigades, emergency services, supervisory authorities, etc.) should also be obliged to use electronic communications. This means, in particular, that electronic media must exist and be accepted, and parallel paper documentation must be dispensed with.
8. The implementation of TAF TSI will not meet all telematics needs in the field of dangerous goods:
- TAF TSI is designed for railway service and information processes, not for safety-critical functions (TAF TSI point 1.1).
  - TAF TSI is incomplete with regard to the processes and message scenarios which may arise in the carriage of dangerous goods. For instance, it lacks details of how to handle trains/wagons parked in sidings; the full message scenario in the event of an accident; and the process for regulatory monitoring.
  - The TAF TSI data catalogues can be used, but are incomplete with regard to dangerous goods. In order to avoid overlap and duplication, it would make sense to administer a common data catalogue.
9. The data proposed by the European Commission for the "identification message" and their sequence partially contradict the current RID rules (Chapter 5.4). Since in the short term carriers which already apply electronic solutions and those which still use paper carriage documents will coexist, the electronic system should represent the rule and paper-based processes the exception.
10. To this end, paragraph 9 of the European Commission's proposal should be amended to state that the electronic consignment note data catalogues are to be applied in implementing telematics in the carriage of dangerous goods. The catalogues are fully compliant with the requirements of Chapter 5.4 and provide clear and comprehensive identification of the dangerous goods. For example, the dangerous goods data in the electronic consignment note fully serve the purpose of an identification message when sending data to the authorities (supervisory or safety authorities) without making it necessary to create a link to the full data set of a database.

The TAF TSI data catalogues should be used to ensure harmonisation with the interoperability requirements, and are thus to be extended accordingly.

11. In this regard UIC and CIT reminded participants of the mandate given to the working group on telematics, which included an investigation into whether current systems fulfilled the requirements for telematics systems. The electronic consignment note was a real and existing system implemented on an ever wider basis. This system, independent from vehicles and ensuring high levels of safety and availability for documents, not only fulfilled the requirement for functional equivalence set out in Chapter 5.4, it even bettered it as the data remained available for example without the intermediary of the driver or in case of fire in vehicles.

### **C. Different solutions specific to different transport modes to be taken into account**

12. Incidentally UIC and CIT pointed out that significant differences existed between transport modes, for example concerning data transmission in the event of an incident. For instance, in rail transport infrastructure managers played the primary/leading role as they had to inform the safety authorities in case of accident. The necessary information for this purpose was obtained from railway undertakings (see paragraph 1.4.2.2.5 and sub-section 1.4.3.6 (b)). In this case various roles were clearly specified, in part by RID, along with the corresponding duties of those involved, and this was clearly beneficial.
13. Infrastructure was becoming “regionally” operated and the emergency services and supervisory authorities – also regionally organised – were therefore available as established contacts. This could form the basis for reliable and permanent communication channels.
14. The contractual relationship between railway undertakings and infrastructure managers based on rules for the use of railway infrastructure made it clear that the infrastructure manager (and thus the emergency services and supervisory authorities) had to be provided with relevant and up-to-date information.
15. In this context it also had to be noted that the GSM-Rail mobile communication system was replacing analogue train radio communication in European rail transport. One of the functionalities of GSM-R was railway-specific emergency calls. SMSs could also be sent via GSM-R (for example to drivers).
16. Germany made allowance for this aspect specific to one transport mode in informal document INF.8 insofar as it considered that different solutions could be considered for each individual transport mode.
17. Due to the current differences (e.g. with road transport), UIC and CIT believed it would be useful for the rail freight sector (incl. combined transport):
  - to amend Chapter 5.4, section 5.4.0 of RID by adding that the information prescribed for the relevant dangerous goods was to be used as a basis for a data catalogue for telematics applications, and
  - to amend sub-section 1.4.3.6 (b) of RID accordingly.

Consequently there would be no need for a link to a database or a special regulation in the TAF TSI (if necessary a reference to the RID).

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