
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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

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

Comments on ECE/TRANS/WP.15/AC.1/2016/3 proposal 4: Dangerous goods safety adviser's annual report

Transmitted by the Government of Spain

Introduction

1. In ECE/TRANS/WP.15/AC.1/2016/3, proposal 4 EASA proposes to introduce a mandatory report according to a specific model into RID/ADR/ADN.
2. Spain introduced in 2001, and modified afterwards through ORDEN FOM/2924/2006, a mandatory format and a minimum content for the safety advisers annual report. The latter regulation can be found under the following link:
<https://www.boe.es/boe/dias/2006/09/26/pdfs/A33640-33646.pdf>
3. A non-official translation for the minimum content of the report is given in the Annex. The rest of the text in the regulation specifies how to fill out the report and where, when and how to hand it in.
4. For each company he is advising, the safety adviser has to send an independent report. The report from one year has to be handed in before the 31. March of the next year.
5. The annual report can be directly uploaded on the websites of the competent authorities, or be sent in in paper format, using the word template available. Around 70% of the reports are directly uploaded by the safety advisers.
6. The uniform minimum content and the availability in a standardized file allows not only to get specific information about that safety adviser and that company, but permits an easy evaluation of all kinds of data, to be used for statistical purposes and to allow planning by the competent authorities.
7. Spain has found it a very useful tool, and the data collected through this system during the last 15 years has indeed provided to be very useful.
8. Therefore, we would support introducing a minimum contents and a specific format into RID/ADR/ADN.

Analysis of ORDEN FOM/2924/2006

9. Orden FOM/2924/2006 asks for a minimum content of the annual report from the safety advisers. Spain wants to give a brief explanation of the interest of each part of the report (see annex for reference of the parts of the annual report):

Identification of safety adviser (1.1)

The goal is to be able to identify the safety adviser, check that his title and specialization is valid for the specific company. This information is basic in case of non-Spanish safety advisers, which are not included into our data base on safety advisers.

Identification of company (1.2)

The goal of asking for this data is to be able to check if the company is inscribed in the data base on dangerous goods companies. Also, it is possible to check if the safety adviser has registered himself for that company. In case of emergency, it is possible to link company and safety adviser, and get further information.

Description of the activities of the company involved and mode of transport (2)

Identifies the activity or activities (loading, unloading, carriage) carried out by that company and the mode or modes of transport used by them.

Territorial coverage of activities of the loading companies (3)

Gives an indication of the % of transport carried which is local, national or international. This data is evaluated together with (4).

Data of goods and activities involved (4)

This is one of the most useful paragraphs to obtain statistically relevant information.

Loading and unloading operations are linked with the class of dangerous goods handled, and also with the postal code of where the operation has taken place. For carriage, only the quantity of goods of each specific class that has been transported is asked for.

Through this data it is possible to know from where to where the goods are moving, class by class. This allows to plan for emergency measures; for example it has been possible to figure out where for example fire fighters needed specific training for one class, moving in high quantities in their assigned area.

Also, by knowing where goods have been loaded and unloaded, it is possible to deduce the transport route, because in Spain for road transport it is mandatory to carry dangerous goods only on a specific network (see http://www.unece.org/trans/danger/publi/adr/country-info_e.html#Spain and http://www.unece.org/fileadmin/DAM/trans/danger/publi/adr/1.9/mapa_mercancias_peligrosas_2016.pdf). This way it is not only possible to plan for emergency services for loading and unloading operations, but also along the route, where dangerous goods traffic density is highest.

The table on carriage gives information on the quantity of dangerous goods of certain classes moved by the company, and the use of road or rail traffic.

List of road vehicles used (5)

With this information it is possible to identify which vehicles are used to move dangerous goods, and to cross-check with the inspection bodies if those fulfil the

regulations on vehicles. Also, knowledge about the real fleet of vehicles is gained, by tonnage, number and type.

Please note that Spain is not a contracting party of ADN, and therefore there is no need to gain information on vessels. Information on rail vehicles can be gained directly through other information sources.

Mode of transport used (6)

Gives an indication of the mode of transport used, and the incidence of multimodal transport. This information is useful to try to develop specific measures to increase multimodality, for example by promoting specific rail itineraries or sea routes.

Means of containment used by the loading companies (7)

Gives the competent authority an indication of which means of containment are used.

Record of notified accidents, occurred during the year, during carriage or during loading or unloading (8)

This record gives a possibility to check if the accidents have been notified, and that the information has reached the relevant authorities.

General information about obligations of safety adviser: Training (9.1)

The information contained in this paragraph is essential for Spain. It gives information about the total number of employees of the company, and of those who are related to dangerous goods transport operations. This data is needed, because in Spain the number of companies that a safety adviser can be assigned to is limited, to guarantee that the safety adviser really is able to work with the companies he is looking after. The number of companies a safety adviser can be assigned to is calculated basing on this data.

Also, knowledge is gained on the training, if it is done, the training is described, and it is checked that the training is registered for each employee.

General information about obligations of safety adviser: checks related to the activities involved (9.2)

This is mainly a check-list on the obligations of the safety adviser. Through the comments, information may be gained that could make inspections in that company advisable.

Comparison of proposal 4 with ORDEN FOM/2924/2006

10. The report proposed in ECE/TRANS/WP.15/AC.1/2016/3 proposal 4 seems to be partially based on the Spanish model, but the data asked for, in the Spanish model, under 2, 3, 4 (partially), 5 and 6 is not included (Description of the activities of the company involved and mode of transport, Territorial coverage of activities of the loading companies, Data of goods and activities involved, List of road vehicles used, Mode of transport used).

11. Through the experience gained during the last 15 years in Spain, we think that the information asked for in the proposal 4 of EASA gives information on the specific company and safety adviser, but is not enough to be really useful to get statistical data that could be evaluated.

12. Specifically, two specific data sets are missing, that were found to be especially useful to provide interesting statistical data: the postal code where loading or unloading processes are carried out and the information on the road vehicles used for the carriage.

13. Precisely these two data sets are those which really give interesting statistical data, and allow to gain information that may allow planning of emergency resources and to gain information about the road vehicles.

Postal code

14. The data of the postal code where loading and unloading take place is anonym enough to not allow the specific identification of the company (once the information is processed and the name of company and safety adviser is not considered), but is nevertheless exact enough to be interesting for planning emergency resources.

Information on the road vehicles

15. The information on the road vehicles allows to monitor the vehicles and the use that is done by them, and get statistical information about which vehicles and kind of vehicles do which kind of transports (local, national, international). In some cases, specific measures for specific vehicles have been taken, basing on this information.

Further improvements that could be made

16. Further improvements on the format could be done, but a detail that has to be corrected, both in the Spanish Regulation and in this proposal is that, when indicating the quantity of material which has to be transported, for class 7 not the mass (t), but the activity (Bq) should be indicated in the table. Also, in the other classes it should be said mass (t) or volume (l), to consider both gases and liquids.

Conclusion

17. The experience during the last 15 years in Spain with regulating a minimum contents of the annual report has been very positive. Spain has found the information gained through them very useful, mainly to be able to plan for measures meant to increase transport safety. Therefore, Spain would support introducing a minimum contents and a specific format into RID/ADR/ADN, and would be willing to further collaborate on this subject.

Annex: Minimum contents of the annual report, according to ORDEN FOM /2924/2006 (non official translation)

DANGEROUS GOODS SAFETY ADVISER'S ANNUAL REPORT

Year of report

1. Identification of safety adviser and company

1.1 Identification of safety adviser

Surname of safety adviser

Name of safety adviser..... NIF

Speciality

Modo of transport

Activity area

Telephone number

1.2 Identification of company

The name of company (registered office)

CIF/NIF Registered office /Headquarters

Locality /municipality

Province Postal Code

Telephone number Fax

Email address

Address of branch office involved (if different)

Locality /municipality

Province Postal Code

Telephones Fax

Email address

2. Description of the activities of the company involved and mode of transport

Loading Road

Unloading Rail

Carriage

3. Territorial coverage of activities of the loading companies

Autonomous Community %

National %

European Union %

Other %

4. Data of goods and activities involved

LOADING		
CLASS	QUANTITY	POSTAL CODE LOCATION
TOTAL		

UNLOADING		
CLASS	QUANTITY	POSTAL CODE LOCATION
TOTAL		

CARRIAGE	
CLASS	QUANTITY

5. List of road vehicles used

Number plate	Fleet own or external	Type of vehicle	Tare weight	MAM	Codification according to ADR

6. Mode of transport used

- ROAD %
- RAIL %
- OTHER %

7. Means of containment used by the loading companies

- Container
- Tank-container
- Packaging
- GRG
- Tank
- Pressure receptacles (Class 2)
- Tank-wagon
- Portable tank
- Other

8. Record of notified accidents, occurred during the year, during carriage or during loading or unloading.

Date	Location of occurrence

9. General information about obligations of safety adviser.

9.1 Training:

Number of employees on the workplace where the reported activities take place

Number of employees who are involved with the activity

Are the employees involved received and adequate training? YES NO

Is the information contained in the personal file? YES NO

If not explain the measures taken by the company to correct the deficiencies:

Description of training courses:

9.2 Checks related to the activities involved:

	YES	NO	NOT APPLICABLE
1. Are there procedures for compliance with the requirements governing the identification of dangerous goods being transported? Comments:			
2. Does the undertaking's practice take into account, when purchasing means of transport, of any special requirements in connection with the dangerous goods being transported? Comments:			
3. Are there procedures for checking the equipment used in connection with the carriage loading or unloading of dangerous goods? Comments:			
4. Is there implementation of proper emergency procedures in the event of any accident or incident that may affect safety during the carriage, loading or unloading of dangerous goods? Comments:			
5. Is account taken of the legal prescriptions and special requirements associated with the carriage of dangerous goods, in the choice and use of sub-contractors or third parties? Comments:			
6. Is there verification that employees involved in the carriage, loading or unloading of dangerous goods have detailed operational procedures and instructions? Comments:			
7. Is there the introduction of measures to increase awareness of the risks inherent in the carriage, loading and unloading of dangerous goods? Comments:			
8. Is there the implementation of verification procedures to ensure the presence on board the means of transport of the documents and safety equipment which must accompany transport and the compliance of such documents and equipment with the regulations? Comments:			
9. Is there the implementation of verification procedures to ensure compliance with the requirements governing loading and unloading? Comments:			
10. Is there the implementation of appropriate measures to avoid the recurrence of accidents, incidents or serious infringements? Comments:			