Proposals for follow up on reduction of accidents and the risks of Bleve

Submitted by AEGPL

Background

Further to the submission of informal document INF.30 presented by the Government of France, during the March 2011 Session of the Joint Meeting in Bern (21-25 March 2011) we would like to revert on the contents and proposal of this paper and the importance of analysis of accidents data. This is key to identify correctly the root causes, lessons learnt and those preventive actions that will contribute most. We want to reinforce the importance of systematic reporting of accident data and hence our support to the proposal of the Government of France and present additionally one more proposal, to eventually help the initial deliverable towards prevention of Bleve risks.

Below an extract from informal document INF.30 of the March 2011 Session (underlined the key statements we want to reinforce):

- Several examples have pointed out that it could be extremely interesting to analyse accident data, not only on the basis of one single specific accident, but also based upon statistical analysis given a large number of accidents. In particular the working group has been able to assess the efficiency and show the relevance of some safety measures by analysing the statistical data produced.

- Although the idea of accident reporting at European level is already mentioned in 1.8.5, for now it has never led to the reporting of a number of accidents large enough to carry out a statistical analysis at European level. Yet we think the analysis of a large number of recurrent, even if small accidents would be very helpful.

- France suggests a systematic report of accident data, through a simple tool that would cover thoroughly the sections given in the model report in 1.8.5.4. An extract of the French database spreadsheet is given in Annex 1 by way of an example.

The report of the Joint Meeting stated in paragraph 58:

- The Joint Meeting noted with interest the suggestion by France to systematically consolidate data on accidents and welcomed the offer to draw up a more detailed proposal from the model given in informal document INF.30.
Proposal

Accelerate the work on the collection of accidents and their analysis (the Joint Meeting had welcomed the offer for drawing up a more detailed proposal from the model given in informal document INF.30).

Consider amendment of the RID-ADR text, par. 1.8.5.2 as follows:

1.8.5.2 The Contracting Party shall in turn, **systematically** make a report to the Secretariat of the United Nations Economic Commission for Europe with a view to informing the other Contracting Parties.

For information, what is currently in force is as below:

1.8.5.1 If a serious accident or incident takes place during loading, filling, carriage or unloading of dangerous goods on the territory of a Contracting Party, the loader, the filler, carrier or consignee, respectively, shall ascertain that a report confirming to the model prescribed in 1.8.5.4 is made to the competent authority of the Contracting Party concerned.

1.8.5.2 The Contracting Party shall in turn, if necessary make a report to the Secretariat of the United Nations Economic Commission for Europe with a view to informing the other Contracting Parties.

Justification

The reporting and analysis of incidents / accidents that occur in all the businesses is one of the key and most important sources for driving improvement, further innovation, development and progress of those industries. Examples coming from medical care, energy production and distribution, transport in general, as aviation, road, rail and marine transport, are a reality.

A thorough serious and detailed Hazard and Operability Analysis (HAZOP) study of the accidents and incidents, where there are serious consequences or with a high potential impact, can identify and highlight weak areas and indicate a list of actions that will allow the most appropriate control measures to be developed. Once these implemented, this will lead to a reduction in accidents, injuries, fatalities, environmental damage and the consequent financial impact produced by those accidents.

These HAZOP’s will allow focus to be placed on the main root causes and problems that occur with the Transport of Dangerous Goods and they will help the Joint Meeting, to determine the most appropriate social, legislative and technical solutions for avoiding the accidents in a most effective way, including those that can result to a Bleve.

It is most likely that the best way forward would be the establishment of a specific working group whose responsibility would be to give support to the Secretariat of the United Nations Economic Commission for Europe. This will allow the detailed analysis of the accidents, their consolidation and a process put in place for communicating / publishing the detailed conclusions and lessons learnt, including any proposed corrective actions for the future, to the benefit of all member states.