Comment on document 2019/21: Informal working group on telematics: meeting in Vienna (12 to 14 November 2018)

Transmitted by the Government of the Netherlands

Introduction

1. From 12-14 November 2018 the Informal Working Group on Telematics met in Vienna, Austria. The outcomes of this meeting are presented in document ECE/TRANS/WP.15/AC.1/2019/21. During this meeting the informal working group produced Guidelines as a replacement of the initially drafted Memorandum of Understanding (MoU). The purpose of these Guidelines is to support the development of a harmonized system for the use of electronic transport documents during the carriage of dangerous goods, to allow a common understanding of 5.4.0.2 in RID/ADR/ADN and to fulfill the conditions that are set out in 5.4.1 of RID/ADR/ADN.

2. The Netherlands endorses the added value of the use of electronic transport documents during the carriage of dangerous goods and will continue to contribute to further development of the use of electronic data in the field of safe transport of dangerous goods.

Discussion

3. However, since it was decided that the result of the working group would be published in the form of Guidelines instead of the initial MoU, the content, as mentioned in document 2019/21, must be seen in a different light.

4. Section 2 of the Guidelines (Principles for amending the Guidelines) gives a mandate to a limited group of users of the Guidelines to amend these Guidelines without any decision taken by the Joint Meeting. In our view the proposed Guidelines in Section 2 cover activities that undermines the position of the Joint Meeting. For the Netherlands this is not acceptable and as a matter of principle the Netherlands is of the opinion that Section 2 of the Guidelines must be deleted completely.

Proposal

5. The Joint Meeting is invited to discuss this issue with a view to delete Section 2 of the Guidelines and is requested to give its consent to further modifications to the Guidelines during the next foreseen meeting of the informal working group on Telematics in June 2019.