

Working Group on the improvement of the Accident Report.

17-19 Feb. 2020 Paris at UIC

Discussion paper about points (a), (b), (e) and (h) of TOF:

This paper aims at giving some elements to help the discussion about the points (a), (b), (e) and (h), which have not been tackled in many written documents up to now. It does not represent a final position from the French competent authority; however, we believe some of the ideas are worth keeping in mind during this discussion.

Point (a) Clarify the purpose of reporting information on accident, and identify the use of the reported information

The purpose of the report in general is to collect all information on occurrences where the transport didn't follow its normal safe way in order to help making decision for avoiding further problems.

As this decision making process for TDG takes place in international meetings, it is useful to have an harmonized way to describe the occurrences.

This can be declined under several levels:

- 1. Understand how a single accident happened: How it originated, how it went and what were its consequences.*
- 2. Collect information in order to compare several events.*
- 3. Gather data to perform risk assessment for decision-making.*

In our view, the information that is now listed in the draft produced by the working group and are coming from the ERA workshop are the minimum amount of data necessary to understand even one single accident. They may further be used to accomplish also the goals mentioned under 2 and 3 (multiple occurrences and risk assessment)

If it appears that any of our drafts has to be reduced, it should be explained why the information in question are not necessary to understand even one single accident, which is the minimal goal

The difference between the single case accident and the two other levels is not the type of information collected in the occurrence report but the way the data are processed, and the criteria for declaring an occurrence

Level 2 of analysis can only be achieved if a data processing system is in place that allows comparisons between a larger number of occurrences to identify similarities, but the relevant information for each occurrence are the same

Level 3: the use of occurrence reporting for risk assessment, would not so much require a change of the type of information but more a change in reporting criteria.

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For example, if we want to make risk assessment on the probability of having a leakage after a collision, it is necessary to report the collision with or without leakage and not only the cases where a leakage occurs.

Point (b) Clarify the participants responsible for sending the report and/or complementary information

In principle, all the participants may have relevant information on occurrences, so they all shall send a report containing the information that they have.

In particular, each single participant may miss some important information about the happening of the accident.

In relation with the draft provided by the working group, it is important to have a formalized report with all the needed information.

Points (e) Propose measures to facilitate the collection of the report by CA's and transmission of relevant information to UN and OTIF secretariat

and

(h) Take into account the relevant IT tools, including the coordination with the development of Common Occurrence Reporting system (COR)

To ensure that all reports for which the sending to the competent authority is mandatory (by RID/ADR/ADN), there is a need to organize an administrative system to get the information, processing it and forcing noncompliance. This in principle is the responsibility of each competent authority and it's depending on the administrative structure of each state

It is probably not the in the scope of RID ADR AND to define requirements for these processes inside each country.

However, voluntary exchange between authorities can be helpful.

In the context of the EU the situation is different from a legal point of view as EU regulation and/or directive can make it mandatory for member states to organize their national working procedure. Taking this into account it is the interest of EU countries to harmonize RID ADR ADN procedures with similar EU procedures

In general, for the facilitation of occurrence reporting, in our experience, an automatized/dematerialized system of data collection reduces both the burden of competent authority and industry.

Such system is only possible if a well-designed complete and harmonized accident report form is available. Which is the purpose of the work under point (d) of the terms of reference.