

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

16 February 2021

Bern, 15-19 March 2021

Item 9 of the provisional agenda

Any other business

Guidelines for the use of 5.4.0.2 in RID/ADR/ADN- use of the data model in the context of the eFTI-regulation

Transmitted by the Governments of France and Germany

Introduction

1. The Joint Meeting at its session in autumn welcomed the work progress of the informal working group on telematics and agreed on the guidelines for the use of 5.4.0.2 of RID/ADR/ADN. The Joint Meeting also agreed that the guidelines could be applied on a voluntary basis and for each transport mode separately. However, when used, they must be applied consistently. In its February 2020 session, the ITC “encouraged the continuation of the work of WP.15 on telematics for the transport of dangerous goods” (see ECE/TRANS/294, para. 30). This document aims at informing the Joint Meeting about the latest developments in relation with the guidelines as well as connected projects and work at EU level.

2. In the meantime, further work was ongoing between the potential TP1 to develop the necessary functionalities in accordance with the system architecture as described in the guidelines. They joined as Dangerous Goods Transport Information Network Association, see www.dgtina.org.

3. The electronic dangerous goods transport document will be also subject to another legal framework. The Regulation (EU) 2020/1056 of the European Parliament and of the Council of 15 July 2020 on electronic Freight Transport Information (eFTI) lays down the conditions based on which competent authorities are required to accept regulatory information when that information is made available electronically by the economic operators concerned. The eFTI-regulation applies among others also to the information in the dangerous goods transport document as laid down in Chapter 5.4 RID/ADR/ADN. It provides a general framework for electronic communication between economic operators and competent authorities, but further delegation and acts are needed for the implementation.

4. A group was established under the umbrella of the DTLF (Digital Transport and Logistics Forum) to assist the Commission in implementing the eFTI-regulation, the Subgroup 1 “paperless transport” of the DTLF (DTLF SG 1). Task of the group is to provide advice and technical expertise to the Commission and its services in relation to the preparation of legislative proposals and policy initiatives in the field of digital transport and logistics, as well as in their implementation. This includes in particular coordination and cooperation with Member States and stakeholders.

5. The DTLF SG 1 works within different teams. The following teams have been established:

- “Data” Team 1 – aims to contribute to the definition of the common eFTI data set and eFTI data subsets, in line with the information requirements established in the EU and the national legal acts that fall under the scope of the Regulation. Work in this team started in late 2019 and aims to achieve the first draft of an

“EU multimodal data model”, which would constitute the DTLF’s input to the establishment of the eFTI common data set, by spring 2021.

- “Functional” Team 2 – aims to provide input to the preparation of the functional specifications for the implementation of the main elements of the future eFTI environment architecture: the common rules and procedures for the authorities to access and process the eFTI data; the eFTI platforms where the economic operators will make the information available to the authorities, and the eFTI service providers. Work in this team kick-started in early 2020, and the team aims to finalize a first high-level draft business process model, including main functional specifications, in early 2021.
- “Technical” Team 3 – aims to provide advice on the technical aspects of the implementation specifications. As such, its work is linked to and dependent on the outcomes of the functional team. The team formally kick-started in October 2020. The first milestone is to establish a work plan for the team, confirming the scope and methodological approach, to be endorsed at the DTLF Plenary meeting scheduled for 25 February 2021 and to present first preliminary results.
- “Certification” Team 4 – aims to assist with setting up the rules for the certification of the eFTI platforms and eFTI service providers. This team will not start working before 2023, since the certification rules will provide guidance on how to assess the compliance by the eFTI platforms and eFTI service providers with the implementation specifications that will be adopted by the European Commission in 2023.

6. Experts from France, Italy and Germany have been participating in the work of the DTLF SG 1 and its various teams to provide expertise on dangerous goods and the results of the working group on telematics. The experience of the working group on telematics showed that the development of a data model for the dangerous goods document is complex and requires expertise in the field of dangerous goods. Furthermore, the data model needs to be reviewed every two years to ensure compliance with the amendments. The output of the working group on telematics is a data model based on UML modelling. The DATEX II dangerous goods data model was recently updated to the DATEX II, Version 3 standard. In this context also necessary adaptations to RID/ADR/ADN 2021 were incorporated. Therefore, it is important that this mature data model is accepted also for the purpose of the Regulation (EU) 2020/1056. According to the recitals of the Regulation (EU) 2020/1056, the Commission should adopt specifications regarding the functional requirements for eFTI platforms. When adopting those specifications, the Commission should also take into account relevant technical solutions and standards used by existing information and communication technology systems to facilitate implementation and minimize costs.

7. However, the recent discussions of the data team raised concerns that the results of the working group of telematics were not taken sufficiently into account. In particular, it is recommended that the UN/CEFACT Multi Modal Reference Data Model (MMT-RDM) provides the most suitable basis for the establishment of a common data set and the subsets. This cannot be supported for dangerous goods. In the beginning of the process of the development of the dangerous goods data model, the UN/CEFACT standard was considered but found to be not sufficient for the dangerous goods data model. The UN/CEFACT Multi Modal Transport Reference Data Model seems to be primarily conceived for B2B communication or customs (EU and World Customs Organization (WCO)) or maritime single windows (EU and IMO) and may not cover all the relevant elements and structure. Thus, the draft data model of the data team is not compliant with Chapter 5.4 RID/ADR/ADN. It is important to note that the eFTI-regulation applies to information requirements based on various legal acts with different scopes and individual definitions for the single data elements, even when some data elements seem to be the same due to their designation, e.g. “consignor.” or “shipment”. Consequently, the implementation of the eFTI-regulation should not aim to combine the existing freight documents to a single electronic document.

8. Furthermore, a general system for the maintenance of the data model for dangerous goods should be established. As an example, Germany and France worked recently together to check the data model established by the telematics working group for updates related to

the two last biennium and found about 30 points that needed updating. It has to be kept in mind that, although a dematerialized system greatly simplifies the establishment and communication of transport information, it will result, if not correctly updated, in some structurally uncompliant documents that will lead to fines and immobilizations of transports as required, for instance, in the European Union by directive 95/50/EC. Changes may not happen every biennium but it is necessary to perform a check.

9. The maintenance is linked with the amendments to RID/ADR/ADR. Therefore, the best way forward would be to keep the maintenance under the umbrella of the Joint Meeting.

Conclusion

10. Delegations are invited to consult their representatives in the DTLF SG 1 to promote the acceptance of the dangerous goods system architecture and its elements.

11. The UNECE is member of the DTLF SG 1 and should support the acceptance of the dangerous goods data model in the context of the eFTI-regulation. The Joint Meeting might ask the secretariat to coordinate this with the UN/CEFACT secretariat.

12. People working in the general logistic sector should be made aware of the biannual changes in the TDG model regulations and the necessity to check the dangerous goods data model at this periodicity.

13. The Joint Meeting should discuss in which way the maintenance of the dangerous goods data model could be organized in the future. One way that has the merit to use existing structures would be to add this as a working item in the agenda of the Joint Meeting every second year. The Ad hoc Working group for harmonization could be a good place to prepare the checks and provide modifications, if necessary, as it meets every two years. The additional check for documentation would easily being integrated in the more general work of checking amendments.
