

## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

10 September 2014

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

Geneva, 15-19 September 2014

Item 6 of the provisional agenda

#### Report of informal working groups

### Comments on document INF25

#### Transmitted by the Chairman of the Joint Meeting and chairman of the BLEVE working group

1. In document INF 25 some additional information concerning BLEVE prevention is provided. And this is very much welcome. However the document contains criticism of on procedural matters concerning the secretariat and work directly linked to persons
2. It is the duty of the chairman to ensure that the discussions in the joint meeting are constructive fair and concentrate on technical matters. In particular it is not desirable to waste time on discussions accusing people that have dedicated time and effort to help progressing on the matter on BLEVE prevention. Two points have to be clarified:
3. First point: There is selective reporting and AEGPL position are not taken into account.

This is not correct. The report is constituted of several parts. The first part is voluntarily summarized and that touches AEGPL comments as well as comments from any other participants. A more complete description of different positions is presented in other parts of the report as well as the totality of documents that have been presented (see INF 8 and 9)

It is also reminded that the purpose of this session was to look very precisely at the efficiency of two specific measures (safety valve and coating) and therefore it is perfectly normal to have discussions on these subjects mainly. The working group has indeed divided its work according to the subjects. Many other sessions have been dedicated to risk analysis and ranking only (actually proportionally more than for coating and valves).

At this point even if there is a clear question it paragraph 11 of the report based on the view of almost all the competent authority representatives in the working group it has to be noted that it is balanced by a list of clear conditions in paragraph 12 mostly reflecting comments from AEGPL

The proposal from AEGPL are not in contradiction with the subjects that have been focused on at the last sessions . Both are complementary as no ranking and risk analysis based on cause and event tree is possible without knowing the efficiency of each safety barrier.

4. Second point: the document has been placed on the UNECE website too late.

The document has been treated in total conformity with the rules of procedures.

The report has been sent to all participants as a draft the beginning of June it took until the 19<sup>th</sup> of June to get comments and deal with them.

Clearly because of the fact that it was tried to take all comments on board the report was sent to the secretariat at the last moment.

The date when the report was placed on the website is in total conformity with rule 4 (c) stating that the documents shall be made available by the secretariat 42 days before the meeting.

The secretariat also used the possibility given in the annex point 5(b) not to translate bulky documents.

5. This being clarified I invite the interested parties not to spent time raising unnecessary conflicts about formal matters but to concentrate on technical facts. The different research having provided precise data on which some proposals in the report are founded it is also recommended to base any contrary view on equally solid technical data.

---