

OTIF



**ORGANISATION INTERGOUVERNEMENTALE POUR
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES**

**ZWISCHENSTAATLICHE ORGANISATION FÜR DEN
INTERNATIONALEN EISENBAHNVERKEHR**

**INTERGOVERNMENTAL ORGANISATION FOR INTER-
NATIONAL CARRIAGE BY RAIL**

INF. 4

19 October 2012

Original: French

RID: 1st Session of the RID Committee of Experts' standing working group
(Riga, 12 – 15 November 2012)

**UIC Observations on documents OTIF/RID/CE/GTP/2012/1 and OTIF/RID/CE/GTP/2012/2
submitted by Belgium**

1. Belgium is making a request to ban certain loads from being transported in wagons adjacent to other wagons carrying dangerous goods. The request is based on the 1.8.5 report of the Godinne (Belgium) accident of 11 May, 2012.
2. The report specifies that the tank-wagon (26th wagon) was pierced by steel girders which slid forward from the 27th wagon during the collision. Photographs in the report illustrate that this puncture was also due to impact from the wagon itself. The latter could be blamed on the high speed (~ 90 km/h) at which the train was travelling at the time of the collision. Meanwhile the report does not meet the requirements of RID 1.8.5. It does not provide all the required information, namely details about the cause of the accident. The collision was clearly the result of a failure in railway operation. A report in accordance with the provisions of article 23 of the 2004/49/EC Directive would certainly be very helpful in understanding the underlying causes of the accident might make it possible to define appropriate preventive measures, if necessary.
3. Belgium's proposal concerns the rules governing freight train composition. The latter are from European legal provisions, namely 4.2.2.5 in the TSI for Operation and Traffic Management. It is therefore necessary to assess the compatibility of this request in the light of European regulations. Train composition should indeed be defined in a harmonized document.
4. From a practical operational point of view, implementation of the proposed measure would have a significant impact on train composition operations and the way transport is organized – in terms of preparation of traffic, operations in marshalling yards, putting trains into service or providing services to customer railway transport terminals. Depending on the case in question, it would become necessary to:
 - Perform extra shunting manoeuvres to produce trains , generating extra risk, in particular when handling dangerous goods wagons;

For reasons of cost, only a limited number of copies of this document have been made. Delegates are asked to bring their own copies of documents to meetings. OTIF only has a small number of copies available.

- Add buffer wagons (who would provide these ...?);
- Arrange special runs for when wagons cannot be transported together.

Data about these new constraints would furthermore have to be incorporated into the various IT systems used by RUs for organizing freight wagon operations. The latter implies that these new cases and their relevant restrictions would have to be clearly identified.

5. A protective distance added to RID 7.5.3 would not be the same as the one prescribed for Class 1 wagons. The latter only applies to dangerous good wagons and the number of cases affected is extremely low. Use of protective wagons to maintain the protective distance between wagons could result in damage similar to that caused by loads which could slide, especially when running at high speed or in the case of a very heavy load, as was clearly the case in the Godinne accident. Employing wagons equipped with an end partition wall which is higher than the load reduces risk. Nonetheless, there is no guarantee that the latter could prevent a load from sliding in a collision when travelling at 90 km/h.
6. UIC would like to recall that the general issue surrounding protective distances and train composition was already a subject of discussion in the 2007 RID Committee (see documents OTIF/RID/EC/2007/9 and OTIF/RID/EC/2007-A, paragraphs 79 to 83). A large number of the conclusions drawn from the UIC study presented at the time are still valid, even though the Godinne accident does not correspond exactly to all the aspects dealt with in the study, which mainly focused on classification of wagons in a rake in accordance with types of dangerous goods. The study also gives some insight into the negative cost-benefit ratio involved in such measures.
7. The justification for the proposed measure given in document OTIF/RID/EC/GTP/2012/2 is not sufficient. It is not founded on holistic and in-depth investigation. The data provided and the case put forward do not demonstrate feasibility nor do they show why modifying and adding to RID 7.5.3 would be useful. Another questionable issue is the inclusion in RID of measures for wagons not carrying dangerous goods. Belgium's proposal aims to mitigate the consequences of such events, whereas we should be tackling the causes.
8. For this reason, UIC believes that a report in accordance with article 23 of 2004/49/EC should first be made available, in order to justify a decision to create measures to prevent/give protection against such events. Were measures which affect train composition to be proposed, it would first be necessary to make a cost-benefit analysis of the consequences of implementing such a measure on railway freight transport competitiveness. The outcome of such a study would have to be communicated to the RID Committee of Experts for it to check the appropriateness of the measures and decide, where applicable, whether they should be part of general railway legislation (e.g. TSI for Operations and Traffic Management) or regulations for international carriage of dangerous goods by rail.
9. The TSI for Operations and Traffic Management under 4.2.2.4 already contains general requirements for safe loading of goods trains, and 4.2.2.5 provides general requirements for train compositions. The latter specifies that the train should be described in a harmonized document, which is, however not yet available.
10. In summary, UIC considers that in the absence of proper understanding of the causes of the railway accident, given the lack of grounds from a cost-benefit evaluation, and no risk analysis, there is no reliable basis to justify implementation of the measures proposed by Belgium. In the light of available information, the case in question is more to do with general aspects of railway operation safety.
11. The conclusion is that UIC requests the permanent working group not to accept Belgium's proposal.