

Mr. Jochen Conrad Intergovernmental Organisation for International Carriage by Rail (OTIF) Gryphenhübeliweg 30 CH-3006 Bern SWITZERLAND

18 September 2013

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Dear Mr. Conrad,

2nd session of the RID Committee of Experts' standing working group, 18-22 November 2013, Copenhagen

I write seeking consultative status in the work of the RID Committee of Experts' standing working group in order to participate in their deliberations on the carriage of dangerous goods.

The European Association for Coal and Lignite (EURACOAL) was established in 2002 as the umbrella organisation of the European coal industry. It is a trade association funded by its 34 members, comprising national coal associations and direct corporate members from twenty EU and Energy Community states. EURACOAL represents coal producers, importers, traders and consumers at the EU level. It is incorporated under Belgium law as an AISBL (*Association internationale sans but lucratif*) and operates according to a set of legally binding statutes (attached). All members have seats and votes in the EURACOAL General Assembly, held at least annually. EURACOAL's membership, objectives and activities are more fully described on pages 48 to 51 of our Annual Report 2012 (attached).

EURACOAL understands that coal might no longer be classified as "non-dangerous bulk" and that warning signs on coal wagons might therefore be required. We have been in discussion with Deutsche Bahn and the German government who have helpfully suggested that EURACOAL makes representations direct to OTIF.

Clearly, it is in everyone's interest to ensure that trade in coal - a vital commodity for electricity, steel and cement production - is not disrupted. The methods of classification and the consequences of a hazardous classification need to be examined to ensure practical solutions that the industry can apply.

Within EURACOAL's membership, we have individuals who can contribute with expert knowledge to any further debate and discussion on this important topic. We therefore request that the RID Committee of Experts considers our application to participate in their next meeting.

In anticipation of our application being approved, we propose that Dr. Erich Schmitz be registered as a EURACOAL representative at the next meeting of the RID Committee of Experts scheduled for 18-22 November 2013 in Copenhagen. As well as managing the German Association of Coal Importers, he chairs the EURACOAL Market Committee. His contact details are:

Dr. Erich SCHMITZ Geschäftsführer VDKi – Verein der Kohlenimporteure e.V. Ferdinandstrasse 35 20095 Hamburg Germany

erich.schmitz@kohleimporteure.de tel: +49 (40) 32 74 84 handy: +49 (179) 109 34 97

He proposes to work closely with Deutsche Bahn so that a practical solution can be found that allows the continued safe carriage of coal. Dr. Schmitz would be pleased to complete a formal application in due course.

Yours sincerely,

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Brian Ricketts Secretary-General

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cc. Dr. Erich Schmitz, Geschäftsführer, VDKi – Verein der Kohlenimporteure e.V. (Association of Coal Importers – a member of EURACOAL)