



Ministero delle Infrastrutture e dei Trasporti

DIPARTIMENTO PER I TRASPORTI, LA NAVIGAZIONE
ED I SISTEMI INFORMATIVI E STATISTICI

Direzione Generale per il Trasporto Ferroviario
Divisione 5

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Direzione Generale per il Trasporto
Ferroviario
TFE-DIV1
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To OTIF
Intergovernmental Organisation
For International Carriage By Rail
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CH - 3006 Bern/Berne

p.c. Al Capo di Gabinetto del Ministero
delle Infrastrutture e dei Trasporti
Via Nomentana, 2
00161 ROMA

Al Capo della Segreteria Tecnica del
Ministro delle Infrastrutture e dei
Trasporti
Via Nomentana, 2
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Al Capo Dipartimento del
Dipartimento per i trasporti, la
navigazione ed i sistemi informativi
e statistici
Via G. Caraci, 36
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Alla Agenzia Nazionale
per la Sicurezza delle Ferrovie
Piazza della Stazione, 45
20123 - Firenze

SUBJECT: Leakage of dangerous goods by rail vehicles in motion or parked on the national network managed by R.F.I.

This refers to the problem of leakage of dangerous goods by rail vehicles traveling on the Italian rail network, as is known, that led this Administration to take urgent actions following the serious incident of June 29, 2009 in Viareggio. The question of the initiatives taken by Italian Authorities on the tracking of specific controls, which are already covered by RID, by all operators in the transport chain of dangerous goods by rail, has been the subject of discussion at the 49th session of the RID Committee of Experts (Luxembourg, 2-4 November 2010). In this forum, Italy provided a room document titled "Notes concerning actions taken by the Italian Ministry in connection with the transport of dangerous goods", then integrated with the dispatch of the full text of the circular n. 30048 of April 6, 2010.

The good results that the introduction in Italy of the traceability of RID checks produced on the transport of dangerous goods is confirmed by the data available from the NSA and by a detailed report that the National Railway Infrastructure Manager has prepared by monitoring the leakage of dangerous goods occurred during the period from 01/07/2009 to 31/12/2010. From the report it is clear that 46 of the 54 "events" recorded in the monitored period, were happened in transports originated in foreign territory (about 85% of the total) and only 8 cases have concerned transports with starting in Italy.

Available data showed that, with regard to transport on national territory, the careful application of the checklist has limited significantly the number of "events" on trains originated in national territory compared to the total number of recorded events (a decrease of 80% in 2010 compared to 2009).

Overall, the cause of the leakages of dangerous goods is generally attributed to:

- Routine maintenance is not treated with due attention (gaskets, tightening bolts, ...);
- Loading and unloading are performed by people not in possession of due training and environmental awareness.

An important aspect concerns the distribution of "events" for location of entry into the national infrastructure. From this analysis, it appears that 40% of trains on which leakages have been observed had their origin in France.

Subdivision of "Events" for location of entry into the infrastructure managed by R.F.I.		
Location of entry	n.	%
Ventimiglia	20	37 %
Modane	1	2 %
Domo II	5	9 %
Brennero	9	17 %
Tarvisio Boscoverde	7	13 %
Villa Opicina	4	7 %
Total transport with origin in foreign territory	46	85 %
Total transport with origin in Italy	8	15 %

A cause for concern is that the problem of non-compliance with the RID is manifested also in growth, particularly in the last quarter of the period of observation. In fact, dividing the "events" recorded for the quarter it obtain the following timing:

Subdivision of "Events" for quarter (from July 2009 to December 2010)					
3° quarter 2009	4° quarter 2009	1° quarter 2010	2° quarter 2010	3° quarter 2010	4° quarter 2010
6	6	7	9	8	18

The actions taken at national level, although in strict compliance with the controls already included in the international RID, have thus preserved the safe transport of dangerous goods by rail in Italy, through the verification of compliance to these rules of trade with national origin and intercepting those entering the country from abroad. These initiatives were seen as an obstacle to free movement of goods by rail but at the time, data in hand, we can not give up these measures in relation to the growing trend of ongoing losses.

Instead it is necessary that common actions are identified across all the member countries of OTIF to avoid:

- potential dangers in the countries that have not adopted similar mitigation measures;
- costs and waste of time to carry out follow-up actions of the incoming flow of goods;
- risks in placing in safety by the emergency teams;
- representations of the local authorities more involved in activities in securing tank-wagons.

Italy can therefore review the initiatives taken only after the adoption of rules shared by all that give adequate confidence to compliance with the RID of the carriage of dangerous goods. It is therefore suggested that at the level of decision / directive, OTIF makes it mandatory for the documentation of the checks made on the sealing of tank-wagons, after loading and unloading both at the time of departure, providing penalties for the repeated evidence of losses upon delivery to the border plants or during transport on the railway infrastructure.

To be most effective initiatives that will be considered taking on an international level is considered important that the reports are collected and stored by a supranational structure, specifically in charge, so you can take rapid and appropriate action against defaulting parties in the transport chain (keepers, fillers / dischargers, railway undertakings), with the aim to increase the safety of transport and of citizens of all the member countries of OTIF.

Yours sincerely,

The Director-General
Dott. Massimo Provinciali