

Working Group 6

Safety

Comments by EBU

In general I am missing the concrete and overall aim of this part which made it a little bit difficult to judge the content. Besides it seems to be too much concentrated on the Dutch situation in both references and recommendations (f.e. par. 8. point 4).

Some concrete remarks refer to:

1.2. last point: "There are many more measures to improve....., which are divided into four categories": I would say that the proposed measures to a certain extent already have been developed and therefore need to be improved. Besides I am missing a fifth category: Management.

Investigations have shown that roughly some 80 % of accidents happen due to human factors. Therefore it seems that this category should be paid attention as well, at least if it fits into the aim of this paper, which I am - as mentioned above - not sure.

2.4. last paragraph: I do not agree that only additional safety measures are needed in order to facilitate the growth of the transport of hazardous goods. These transports to a certain extent are already almost over-regulated. I would more stress the need of maintenance/retention of existing rules.

3.3. who are the experts, whose estimation in the last paragraph is referred to?

4.3. when mentioning the AIS system as navigation equipment, which according to the paper "does integrate extremely well with ECDIS" I am missing the other system, which also integrates "extremely well" and should be described as well.

5.2. last paragraph: does not fit into the paper in both wording and content. Again starting point is NL, while the paper is intended as referring to international transport. Last sentence more a Dutch concern and not a general one. I would suggest to describe the problem in general wordings and refer to what is already mentioned in my remarks regarding 2.4.

5.3. last two sentences in last paragraph are referring to the new trend of changing tasks and duties of administrations. Reference in general terms has to be made more than in the chosen description, which is not based on evidence but more on feelings. In this paragraph some recommendations for the expected problems, arising out of this new trend, could be made.

6.2. and 7. management aspects (see general remarks) are missing.

8. recommendation point 4: why this reference to Dutch criteria which should be followed by the other EU-member"? If this is preferable, explanation why is needed.

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