
Committee of Experts on the Transport of Dangerous Goods and on the Globally Harmonized System of Classification and Labelling of Chemicals

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Sub-Committee of Experts on the Transport of Dangerous Goods

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Item 6 (d) of the provisional agenda

Miscellaneous proposals for amendments to the Model Regulations on the Transport of Dangerous Goods: other miscellaneous proposals

Proposal to introduce the concept of “virtual presence” to the Model Regulations

Submitted by the International Dangerous Goods and Containers Association (IDGCA)

Introduction

1. During the pandemic and the restrictions on free movement between cities and countries, modern technologies for remote communication and remote control have developed significantly. With the help of computer programs and equipment for remote communication and control, important state meetings are held, international documents are developed, training is carried out, manufacturer`s quality systems are audited and products are inspected. Some competent authorities, classification societies and inspection bodies began to actively carry out remote audits and inspections without the actual presence at the facility. Based on the results of remote audits, competent authorities (inspection bodies) issue valid certificates and acts.

2. Despite the practice of using remote communication technology in the inspecting activities, there is no legal basis for these methods, in the UN Model Regulations in particular. We expect that communication technologies will keep developing and the method of remote inspection will become fully equivalent to an inspection with the actual presence at the enterprise.

Proposal

3. We invite the experts to discuss the necessity (or lack thereof) of introducing the term “virtual presence” into the UN Model Regulations. In the case of support of this proposal by the majority of experts we propose to develop standards regulating the remote method of survey, inspection and audit.

4. The regulations can include:

- (a) The requirements for training of the inspection body`s representative (non-exclusive surveyor) who would be present at the facility and provide the competent authority live footage for audit/survey/inspection over the internet.
- (b) The requirements for software programs used during remote audit/survey/inspection.
- (c) The requirements for equipment that would ensure high quality photo and video materials, audio transmission, video calls.

Justification

5. The introduction of the concept of "virtual presence" and the development of the corresponding requirements will give legitimacy to decisions made on the basis of remote audits, control and inspection.
