

References to Standards Included in Provisions for the Transport of Gases

Transmitted by the Expert of Germany

1. At its sixteenth session, the Sub-Committee was informed by the expert from Germany of the principles adopted by the RID/ADR Joint Meeting in respect of references to standards, and the Working Group was asked to consider the following principles:
 - The regulations should contain all essential requirements.
 - Standards are a possible means of complying with the regulations.
 - Reference should be made to dated standards.

Germany welcomes the fact that these principles were taken as a basis for the proposals made by the Working Group (ST/SG/AC.10/C.3/32/Add.1).

2. The expert from Germany would like to call the Sub-Committee's and the Working Group's attention to another principal aspect in connection with references to standards, namely the marking with the UN symbol.

According to the relevant provisions on marking of packagings included in 6.1.3, 6.5.2 and 6.6.3 of the Model Regulations, packagings, IBCs and large packagings shall be marked with the UN symbol. This marking certifies that a packaging complies with the relevant construction and test requirements.

This should also apply to pressure receptacles. The UN mark should not be restricted to those designed, manufactured and tested according to referenced standards (see 6.2.1.6.4 in ST/SG/AC.10/C.3/32/Add.1). Otherwise essential requirements of the regulations would be irrelevant, since receptacles complying with these requirements but not with the referenced standards would not be allowed to bear the UN mark. Consequently these receptacles could not be used for international transport. This would virtually mean a mandatory application of referenced standards.

On the other hand, Germany certainly sees the differences between the requirements for packagings and those for pressure receptacles. Possibly not all countries where pressure receptacles are constructed have appropriate technical codes. But this should not lead to restricting the UN mark to receptacles constructed according to referenced standards, but to incorporating more detailed requirements into the regulations.

3. Apart from that, the question of accepting receptacles should be answered through national legislation or regional (or world-wide) agreements.