ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of dangerous goods
(Seventy-sixth session,
agenda item 5,
Geneva, 3-7 May 2004)

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Cylinders used for hot air balloons

Comments on TRANS/WP.15/2004/15 and informal document INF.31 from the meeting of January 2004

Transmitted by the Government of Switzerland

It is true that there are several cylinders in use which do not fulfil the requirements and therefore do not meet the safety standards of the ADR. If we deviate from these safety standards there must be a compensation.

Under justification in document INF.15, it is mentioned that these cylinders are manufactured to exacting standards. But in reality, they are manufactured to factory standards and afterwards approved by a national authority. Therefore, the standards and with it the safety of these cylinders differ from one country to another. The same problem arises with testing and inspection as different countries have different inspection periods and different requirements for the inspections.

Remedies to these problems may bring additional requirements to the proposed 6xx, e.g.:

- With the exemptions mentioned in (c), (d), (e) the design, manufacturing and testing has to be in accordance with a standard accepted by the ADR or a technical code recognized by the competent authority (ADR).

- Add to 2, letter f:

  “The test pressure shall not be less than 30bar”.


- Add to 2, letter f:

“If relief devices are used with a set pressure above 30 bar, the test pressure has to be at least the set pressure”.

- Add to 2, letter g:

"The cylinder has to be carried fixed in the basket or in an additional safety device."

- Periodic inspection has to be carried out every 2 years by a body approved by the competent authority according to the ADR.

We propose to add these additional aspects to the recommendation in paper 15 or to discuss the whole matter in a working group without being pressed for time.