

Joint Meeting of the RID Safety Committee
and the Working Party on the Transport of
Dangerous Goods

INF. 32

(Genève, 13-17 September 2004)

Joint Meeting Standards Working Group
Report of the fourth meeting,
Genève, 13 - 15 September 2004

1. The Standards Working Group met outside the plenary sessions of the Joint Meeting under the chairmanship of Mr P.Wolfs. The Working Group was tasked by the Plenary Meeting to consider document INF.11rev1.
2. INF.11rev1 consolidates the comments received from national delegates on
 - a. 14 standards that are at stage 2 of the approval process and are submitted to the Joint Meeting for comments only;
 - b. 5 standards that are at stage 3 of the approval process and are submitted to the Joint Meeting for provisional acceptance;The results of the discussions on the comments are summarised in Annex 2 to this report;
3. The discussion of INF.11 started with the comments on the standards submitted for approval;
 - a. 2 standards were rejected: prEN 14595 and prEN 14334 (see comments in Annex 2)
 - b. 3 standards were accepted for reference when published (see proposal in Annex 1)
4. The discussion of INF.11 continued with the comments on the standards that are at Public Enquiry Stage (Stage 2 of the JM adoption process). These comments will be circulated to the relevant EN TC's. These comments are in addition to the comments of the CEN consultant when they were not included in the review.

Proposals to amend ADR/RID

Proposal 1: modify the existing references to standards when the amendments are published:

a) in the table of 6.2. 2 of ADR/RID

Reference	Title of document	Applicable sub-sections and paragraphs
for design and construction		
[EN1442:1998:prA2	Transportable refillable welded steel gas cylinders for liquefied petroleum gas (LPG) - Design and construction	6.2.1.1, 6.2.1.5
PrEN 13769:2003/prA1	Transportable gas cylinders – Cylinder bundles – Design, manufacture, identification and testing	6.2.1.1, 6.2.1.5 and 6.2.1.7]

Note: the approval of EN 1442:1998 A2 is made conditional that in the published version the row 4 of Table A1 is deleted.

Proposal 2: add a new reference in the table of 6.8.2.6 of ADR when the document is published

Applicable sub-sections and paragraphs	Reference	Title of document
<i>For tanks and service equipment intended for the transport of liquid petroleum products and other dangerous substances of Class 3 which have a vapour pressure not exceeding 110 kPa at 50 °C and petrol, and which have no-sub-classification as toxic or corrosive.</i>		
6.8.2.2 and 6.8.2.4.1	prEN 14595	Tanks for transport of dangerous goods - Service equipment for tanks – Pressure and vacuum breather vent

Comments on standards submitted by CEN before the meeting

A. Standards at Stage 2: Submitted for Public Enquiry

Dispatch from CEN dated 9 April 2004

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN 1439rev dd AUG 03	Transportable refillable welded steel cylinders for liquefied petroleum gas (LPG) – Procedure for checking before, during and after filling		
<p><i>Comments from members of the Joint Meeting:</i></p> <p><u>Switzerland:</u></p> <ol style="list-style-type: none"> In the definitions the old 3.7 „Filling ratio“ is missing and in table A.2 the standard filling ratio of the ADR/RID (P200) should be mentioned Accepted in new version of the document 4.1 Cylinders suitable for filling: the manufacturer and his serial number must be identifiable Accepted Sentence below Table 2, → a wall thickness less than the minimum design value is not acceptable. We agree with the assessment of the CEN Consultant Accepted in new version of the document <p><i>Comments from CEN consultant:</i></p> <ol style="list-style-type: none"> The standard speaks about “filling quantity/amount” not about “filling ratio”; the filling ratios of ADR could be helpful or add” see fixed values in P200 of ADR/RID but the criteria of P200 are included in A2; the objective of the standard is to have deviations from the ADR criteria (reference temperature being accepted). This is not a requirement in the other standards for pre-filling inspection already adopted in P200 (e.g. EN 1919, 1920); accepted, will be addressed in a future draft version Agree 			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 1440rev Sep 03	Transportable refillable welded steel cylinders for liquefied petroleum gas (LPG) – Periodic requalification		
<p><i>Comments from members of the Joint Meeting:</i></p> <p><u>Finland</u></p> <ol style="list-style-type: none"> 5.1, General, the first paragraph: According to ADR (6.2.1.6.1) both the hydraulic pressure test and internal inspection are obligatory in periodic inspection, not alternative. With the agreement of the testing and certifying body approved by the competent authority of the country of approval the hydraulic pressure test may be replaced by a test using gas, where such operation does not entail any danger, or by an equivalent method based on ultrasound or acoustic emission. When it is question about welded steel cylinder (intended for the carriage of UN No. 1965) with a capacity below 6.5 l hydraulic pressure test may be replaced by another test ensuring an equivalent level of safety. Accepted in principle <p>The paragraph should be written so that it is according to ADR.</p> <ol style="list-style-type: none"> 5.1, General, the third paragraph: According to ADR 2005 (6.2.1.6.1) a refillable pressure receptacle shall be subjected to periodic inspection by a body approved by the competent authority of the country of approval. Accepted in new version of the document 			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
<p><u>Switzerland:</u></p> <p>3. The interval between periodic inspection is 10 years. It may be extended with the agreement of the competent authority presumed the requirements of Annex A/A1 are fully complied with. Therefore Annex A should be informative only; Annex A should stay normative but the second condition in ADR (approval by competent authority) will be added in section 4</p> <p>4. For the periodic inspection according to the ADR/RID a hydraulic test has to be applied at test pressure. It could be replaced by a pneumatic test at test pressure but not by other tests. Noted</p> <p><i>Comments from CEN consultant:</i></p> <ol style="list-style-type: none"> 1. Agree, same comment made 2. Agree: body competent body instead of competent person 3. Disagree: this annex is the justification for 15 years to be acceptable; the content is normative by it remains conditional to the approval of the competent authority. 4. Agree, same as 2 			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14763 Aug 03	Transportable refillable composite cylinders for Liquefied Petroleum Gas (LPG)- Procedure for checking before, during and after filling		
<p><i>Comments from members of the Joint Meeting:</i></p> <p><u>Finland</u></p> <ol style="list-style-type: none"> 1. 5, Table 1: The table 1 is more specific than the equivalent table in the standard prEN 14767, although the standard prEN 14767 is for periodic inspection and the standard prEN 14763 is only for checking during normal filling procedure. Accepted, tables will be aligned 2. Annex A: In the picture A.6 it is referred to "level 1", which has not specified in standard. Accepted , is clarified in new version <p><u>Switzerland:</u></p> <ol style="list-style-type: none"> 3. The words transparent and translucent are used in this standard. Is there a difference in the meaning? 4. 3.13 reconditioning in accordance with this point is not acceptable; reconditioning will be redefined in new version 5. 3.14 the characteristics of a cylinder should be compared with the specified requirements of the type approval, independent of the used standards accepted; change into "the approved min.wall thickness" 6. 4.1 Cylinders suitable for filling: the manufacturer and his serial number must be identifiable accepted, same as for EN 1439 7. 4.3 instead of the standard the type approval should be used for compliance check accepted 8. 4.3.d cylinders that can not be identified have to be scrapped; accepted, to be included in the table of rejection criteria 9. Table 1, Rejection limits: „when the depth exceeds 10% of composite overwrap thickness“ → How do you know the thickness of the overwrap? This may vary from one supplier to an other. We suggest that a rejection should be made as soon as the fibre matrix is hurt. accepted, table has been revised in new ver- 			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
	<p>sion</p> <p>Heat/fire Figure A7 should be figure A9; accepted, There should be an additional line: Lack of identity</p> <p><i>Comments from CEN consultant:</i></p> <ol style="list-style-type: none"> 1. Technical comment for the TC; 2. Cannot see "level 1" on fig.6; 3. Technical comment for the TC 4. 3.13 is a definition of what is "reconditioning" 5. agree; same comment made on the scope; not limited to cylinders manufactured according to EN 14427;l 6. see comment above for EN 1439; 7. see comment for 5; 8. This is a first selection; the "further assessment" by a more competent person may come to that conclusion 9. Agree; same remark made; 		

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14767 August 03	Transportable refillable composite cylinders for Liquefied Petroleum Gas (LPG) - Periodic requalification		
<p><i>Comments from members of the Joint Meeting:</i></p> <p><u>Finland</u></p> <ol style="list-style-type: none"> 1. 5.1, General, the first and second paragraph: According to ADR (6.2.1.6.1) both the hydraulic pressure test and internal inspection are obligatory in periodic inspection. With the agreement of the testing and certifying body approved by the competent authority of the country of approval the hydraulic pressure test may be replaced by a test using gas, where such operation does not entail any danger, or by an equivalent method based on ultrasound or acoustic emission. When it is question about welded steel cylinder (intended for the carriage of UN No.1965) with a capacity below 6.5 / hydraulic pressure test may be replaced by another test ensuring an equivalent level of safety. Accepted in principle <p>The paragraph should be written so that it is according to ADR.</p> 2. 5.1, General, the third paragraph According to ADR 2005 (6.2.1.6.1) a refillable pressure receptacle shall be subjected to periodic inspections by a body approved by the competent authority of the country of approval. Accepted in new version of the document 3. 5.2.3, Table 1 The table 1 is less specific than the equivalent table in the standard prEN 14763, although the standard prEN 14767 is for periodic inspection and the standard prEN 14763 is only for checking during normal filling procedure. The table 1 should be complemented according to prEN 14763. Accepted, tables will be aligned 4. Annex A In the pictures it is referred to "level 1", "level 2" and "level 3", which have not specified in standard. Accepted, clarified in new draft version 			

5. Annex B, B.3

Should standard EN 1440 replaced with prEN 14763? **accepted**

Switzerland:

- 6. 4. The interval between periodic inspection is part of the type examination and will be decided by the competent authority. It may be extended with the agreement of the competent authority presumed the requirements of Annex B/B1 are fully complied with. Therefore Annex B should be informative only. **Accepted, same solution as for EN 1440**
- 7. Table 1, Rejection limits: „when the depth exceeds 10% of composite overwrap thickness“ → How do you know the thickness of the overwrap? This may vary from one supplier to an other. We suggest that a rejection should be made as soon as the fibre matrix is hurt.
Heat/fire Figure A7 should be figure A9
There should be an additional line: Lack of identity **see new version**
- 8. 5.1 Second sentence should read: ...or is a **non translucent cylinder** then....described in 5.4 5.3 **see new version**
- 9. 5.4.3.2 f) a cylinder that fails the pneumatic test is not allowed to be reconditioned! **accepted**
- 10. 5.4.4 this test can not replace the pressure test at test pressure **accepted**
- 11. 5.4.4.2 Note 1.....with the acceptance of the competent authority **accepted note 1 deleted**
- 12. Note 2: as ultrasonic testing is not a standard procedure it can not be replaced by a standard procedure as visual inspection **accepted note 1 deleted**
- 13. Annex A : There are several editorial errors in this annex **corrected in new draft version**

Comments from CEN consultant:

- 1. Agree; similar comment made;
- 2. Agree; as above for EN 1440
- 3. Technical comment for the TC
- 4. Technical comment for the TC
- 5. Agree, same comment made for EN 1439;
- 6. if the content of Annex B shall be complied with, why cannot it stay normative; extension is always subject to approval from competent authority.
- 7. Technical comment for the TC;
- 8. Technical comment for the TC;
- 9. editorial: cross reference is 5.3 instead of 5.4
- 10. agree, same comment made;
- 11. agree, same comment made;
- 12. Technical comment for the TC
- 13. Editorial comment for the TC

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14794 Sep 2003	LPG equipment and accessories - Transportable refillable aluminium cylinders for liquefied petroleum gas (LPG) - Procedure for checking before, during and after filling		

Comments from members of the Joint Meeting:

Finland

1. **3.6, cylinder** The word "container" should be replaced with the words "pressure receptacle". **accepted**

2. **4.2, paragraph e)**

The example is misleading. The conformity mark (II) is used to indicate that a equipment fulfils the regulations of the directive of the transportable pressure equipment. It is not the symbol of inspection body. **accepted**

3. **6.1, Safe filling quantity**

The text of the special packing provision "t" (section 4.1.4, P200 in ADR) should be modified. If text is not modified, other filling criteria can't use for aluminium cylinders. **accepted**

Switzerland:

4. 4.2 Cylinders suitable for filling: the manufacturer and his serial number must be identifiable **accepted**

5. 4.4a) There is no indication of tara weight in EN 13110

6. 4.5 Repairs are only allowed at the valve. **accepted**

7. 5. Reassessment of cylinders; The decision if a cylinder is still serviceable according to table 1-3 must be done by the competent body **accepted**

8. Table 2 : A reduction of the calculated wall thickness can not be accepted; **accepted to be changed into "approved min. wall thickness"**

9. Annex A: In table A.1 the standard filling ratio of the ADR/RID (P200) should be mentioned **accepted**

Comments from CEN consultant:

1. editorial comment for the TC;

2. agree; the example should be removed;

1. agree; if this standard is adopted; provision "ta" of P200 should be modified;

2. see previous comment above;

3. see Annex A of EN 13110 for details of marking

4. Technical comment for the TC;

5. There is no competent body involved during the pre-fill inspections;

6. it is "below the design min wall thickness"

7. same comment as for EN 1439 –see above

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14795 Sep. 2003	Transportable refillable aluminium cylinders for Liquefied Petroleum Gas (LPG) – Periodic requalification		

Comments from members of the Joint Meeting:

Finland

1. **3.3 Periodic inspection** Should the standard reference be EN 13110 instead of EN 1442? EN 13110 is adopted for reference in ADR 2005 (6.2.2). **accepted**

2. **4.2 Criteria, 4.2.1 and 4.2.2:** It would be better if words "an equivalent" were replaced with words "an equivalent standard approved by a competent authority". **Accepted, criteria deleted**

3. **7.5, Marking text below the list:** According to ADR (6.2.1.7) the height of markings depends on the size of a cylinder. The height of markings shall be according ADR regulations. **Accepted, will be related to new standard**

Switzerland:

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
4.	3.3 ... specified requirements as defined in EN 1442 → EN 13110/EN12862 or an equivalent standard accepted, see above		
5.	4. Agree with the comment of the CEN consultant but → The interval between periodic inspection is 10 years. It may be extended with the agreement of the competent authority presumed the requirements of 4.2 are fully complied with. Therefore it should read: of 10 years may apply..... accepted, there is no intention to extend to 15 years		
6.	5.2 For the periodic inspection according to the ADR/RID a hydraulic test has to be applied at test pressure. It could be replaced by a pneumatic test at test pressure but not by other tests. In our opinion it is important the tests at test pressure carried out and therefore no change or note in the ADR/RID should be made accepted		
7.	5.3.2 last sentence: There should be a list of allowed reconditioning work to be addressed to TC286		
8.	Table 2: A reduction of the calculated wall thickness can not be accepted; accepted		
9.	5.5.2.2 Reference should be made to a standard concerning Aluminium cylinders instead of steel cylinders EN1439 accepted		
10.	7.3 There is no indication of tara weight in EN 13110		
11.	7.7 The cylinder content shall be identified according to the ADR/RID accepted		
12.	Bibliography: the appropriate standards for aluminium cylinders should be mentioned instead of standards for steel cylinders accepted		
<i>Comments from CEN consultant:</i>			
1. Agree; cross refer to EN 13110;			
2. Agree, same comment made;			
3. Agree;			
4. Same as 1;			
5. Same comment;			
6. Same comment made as for EN 1440;			
7. Technical comment for the TC;			
8. ... not below the minimum wall thickness (as proposed)			
9. Agree; should refer to EN 14794;			
10. see Annex A of EN 13110			
11. is "commercial propane" not equivalent to "propane"			
12. Agree; editorial comments for the TC			

Dispatch from CEN dated 1 June 2004

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14914	Transportable refillable welded steel cylinders for liquefied petroleum gas (LPG) – Alternative design and construction - Periodic inspection		

Comments from members of the Joint Meeting:

Switzerland:

4. The interval between periodic inspection is 10 years. It may be extended with the agreement of the

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
	competent authority presumed the requirements of Annex A/A1-A3 are fully complied with. Therefore Annex A should be informative only accepted see EN 1440		
2.	5.1 Third sentence:under the authority of a competent person body accepted		
3.	5.2.3 A wall thickness less than the minimum design value is not acceptable accepted		
4.	5.3.2.4 Note1: Welding or repairing.....approved by the competent person body accepted		
<u>Finland:</u>			
5.	5.1, General and 5.3.4, Pneumatic proof test and leak test and 5.3.5, Pneumatic leak test: Cylinders shall be subjected to periodic inspections by a body approved by competent authority of country of approval. According to ADR (6.2.1.6.1) both the hydraulic pressure test and internal inspection are obligatory in periodic inspection, not alternative. With the agreement of the testing and certifying body approved by the competent authority of the country of approval the hydraulic pressure test may be replaced by a test using gas, where such operation does not entail any danger, or by an equivalent method based on ultrasound or acoustic emission. When it is question about welded steel cylinder (intended for the carriage of UN No. 1965) with a capacity below 6.5 / hydraulic pressure test may be replaced by another test ensuring an equivalent level of safety. To be addressed to TC286		
<i>Comments from CEN consultant:</i>			
1.	Same comment as for EN 14767;		
2.	when the “retester” operates under an QC system, the competent body keeps the “responsibility” but has no “authority” on the workers performing the retesting operations;		
3.	Agree; same comment made;		
4.	debatable; ADR does not forbid repairs; Technical comment to TC		
5.	same comment made on assessment form;		

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14912	LPG equipment and accessories – Inspection and maintenance of LPG cylinder valves at time of periodic inspection of cylinders		
<i>Comments from members of the Joint Meeting:</i>			
<u>Switzerland:</u>			
1.	In our opinion this standard should not be referred to in ADR/RID as it is part of the standards for periodic testing and not part of an ADR/RID requirement. no decision; the need to have this standard referred in the ADR/RID shall be discussed again when the standard is resubmitted at stage 3;		
<i>Comments from CEN consultant:</i>			
1.	what about 6.2.1.6.1 (a) External examination of the receptacle, <u>equipment</u> and markings;		

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14913	Transportable refillable welded steel cylinders for liquefied petroleum gas (LPG) – Alternative design and construction - Procedure for checking before, during and after filling		
<i>Comments from members of the Joint Meeting:</i>			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
<u>Switzerland:</u>			
1.	4.1 Cylinders suitable for filling: the manufacturer and his serial number must be identifiable;		accepted
2.	5.2 A wall thickness less than the minimum design value is not acceptable		accepted
3.	5.3 Table 4: Cut or gouge → what is the undamaged inner Wall?		accepted
4.	Annex A: Table A.1, the standard filling ratio of the ADR/RID (P200) should be mentioned		accepted, the table will be revised, the annex A should be informative and should refer to the competent authority; the marking should indicate the restriction of the country when non-ADR filling ratios are used
5.	<u>Finland:</u>		
6.	3.7, Filling ratio: In ADR "Filling ratio" means the ratio of the mass of gas to the mass of water at 15 °C that would fill completely a pressure receptacle fitted ready for use". The standard has not an indication about temperature. Comment of CEN consultant is accepted		
<i>Comments from CEN consultant:</i>			
1.	see comment above;		
2.	these cylinders are approved on the basis of experimental testing without minimum design thickness; the acceptance of reduced thickness should be subject to approval of competent body and not competent person;		
3.	see comment as for EN 1439		
4.	the filling ratio is agreed by the competent authority (see definition 3.7) who will agree on the reference temperature that could be used		
5.	this is a definition that ends with:as agreed by the competent authority and refers to Annex A that includes the ADR reference temperature		

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14876	Transportable gas - Periodic inspection and testing of welded steel pressure drums		
<i>Comments from members of the Joint Meeting:</i>			
<u>Switzerland:</u>			
1.	4./9. Additional test shall be carried out in agreement with the competent body		the paragraph on competent person will be removed and the last paragraph shall be rearranged
2.	10.4 such re-machining has to be recorded by writing and approved by the competent body		accepted
3.	14.5 / 14.6 Stamping and marking has to be in accordance with ADR/RID		accepted
4.	Table 1: Any reduction of the calculated wall thickness can not be accepted		accepted as "approved min. wall thickness" ; add a sentence on approved repair shops"
5.	Table 2: Chain pitting add "or if the wall thickness is less than design thickness"		same as 4
6.	Table 2: Crevice corrosion add " or if the wall thickness is less than design thickness"		same as 4
7.	Annex B to be deleted; not necessary		accepted
<u>Finland:</u>			
8.	4 List of procedures for periodic inspection and test: According to ADR 2005 (6.2.1.6) refillable pressure receptacles shall be subjected to periodic inspections by a body approved by the competent authority of the country of approval, not competent persons. See above, same as 1		

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
9.	14.5, Stamp marking: In ADR 2005 there are new requirements for marking of periodic inspection. The standard 13769 should contain these ADR requirement or new requirements should be written to this standard (14876) see above same as 3		
10.	Annex, A.5 Special marking: Section would be changed as follows: "...with the mark π according to the TPED directive provided the requirements of RID/ADR directives have been fully verified. Comment of consultant accepted		
<i>Comments from CEN consultant:</i>			
1. unclear about the referred paragraph			
2. technical comment for TC			
3. reference is made to ISO 13769 that will be replacing EN 1089-1 and hopefully be in compliance with ADR;			
4. accepted as note b);			
5. is this not understood with note c)			
6. is			
7. in the meaning of the standard, the competent person is the person actually performing the inspections tasks, not the body taking the responsibility			
8. the reference to EN 13769 will be only normative if that standard itself is referred to in ADR/RID;			
9. Annex A is TPED specific and should not be included in the reference to ADR/RID			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN 14893	LPG Equipment and accessories - Transportable LPG metallic pressure drums with a capacity between 150 and 1000 litres		
<i>Comments from members of the Joint Meeting:</i>			
<u>Switzerland:</u>			
1. 11. Marking according to ADR			
2. 12.3 the cylinder shall be partially be filled ; accepted, that shall be clarified			
3. Annex D: There should only be a reference to the appropriate standards eg. EN ISO 6520-1 not ADR relevant			
<u>Finland:</u>			
4. 5.1, General, the third sentence: Standards (".. national/international standard...") should be approved by a competent authority/competent body, if standards are not mentioned in ADR could be made clearer			
5. 11 Marking: Marking should be according to ADR. The standard 14894 is not mentioned in ADR 2005. comment not accepted			
<u>UK:</u>			
is not in favour of accepting this standard as a reference document, redundant with EN 14208			
<i>Comments from CEN consultant:</i>			
1. hopefully shall EN 14894 when ready be adopted as a reference document in ADR ;			
2. partially filled is more dangerous in case of rupture;			
3. Technical comment for the TC;			
4. the standards in question are the standards defining the quality of the LPG to justify no corrosion allow-			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
<p>ance;</p> <p>5. see answer to 1</p>			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14894	LPG Equipment and accessories – LPG cylinder marking		

Comments from members of the Joint Meeting:

Switzerland:

1. If you put the gas name „Butane“ somewhere in the ADR marking this may be confusing. If the test pressure of 15 bar is a problem for the owner then it should clearly be stated above or below the ADR/RID marking „FOR UN 1011/1965 BUTANE ONLY“. But this marking shall not conflict with the required marking **accepted**,
2. O2: The marking of the empty mass consists only of the figures XXXKG. If the customer wishes to have the Gas indicated it should be placed outside the range of the ADR/RID marking (→A8) and show the correct term in accordance with ADR/RID e.g. UN1965 Propane ore UN 1965 Butane **accepted, the name of the gas should be elsewhere, the UN number shall be included**
3. A2: According to ADR/RID 2005 four digits may also be used to indicate the year.
4. The month need not be indicated if the interval between periodic inspections is ten years or more

Finland:

5. **3.3.2, tare weight mark:** In ADR (6.2.7.1.2, f) it is required empty mass, not tare weigh mass. The empty mass of UN 1965 shall not include e.g. the mass of valve. Not accepted
6. **8, Other stamp markings:** For information that in ADR 2005 there are new requirements for marking of periodic inspection. **accepted**

Comments from CEN consultant:

1. The product mark is after the manufacturer marks; I do not see a cause for confusion;
2. There is no sequence for the operational marks in ADR ; I see no added value in indicating UN 1965 before Propane or Butane;
3. Technical comment for the TC;
4. it seems that this allowance has disappeared in the 2005 edition
- 5.

Dispatch from CEN dated 28 June 2004

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN ISO10297	Transportable gas cylinders – Cylinder valves – Specification and type testing		

Comments from members of the Joint Meeting:

Switzerland:

1. the standard does not include a drop test with the combination valve/cylinder;

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
2.	Is the cycle test long enough for the extended periodicity of 15 years for LPG cylinders		
Comments from CEN consultant:			
1. EN 849 and EN 10297 include an impact test instead of a drop test. Both standard are already included in ADR			
2. Technical comment for the TC			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
ISO/DIS 16148.2	Gas cylinders – Refillable seamless steel gas cylinders – Acoustic emission examination (AEE) for periodic inspection		
Comments from members of the Joint Meeting: <i>No comment received</i> Comments from CEN consultant:			

B. Standards at Stage 3: Submitted for Final Voting

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
EN1442:1998:prA 2	Transportable refillable welded steel gas cylinders for liquefied petroleum gas (LPG) - Design and construction		
Comments from members of the Joint Meeting: Switzerland: 1. If you put the gas name „Butane“ somewhere in the ADR marking area, this may be confusing. If the test pressure of 15 bar is a problem for the owner then it should clearly be stated above or below the ADR/RID marking „FOR UN 1011/1095 BUTANE ONLY“. But this marking shall not conflict with the required marks. Comments from CEN consultant: 1. I do not see the potential for confusion and conflict with other markings; Decision of the Standards Working Group: Accepted X the approval of EN 1442:1998 A2 is made conditional that in the published version the row 4 of Table A1 is deleted.			

Dispatch from CEN dated 28 June 2004

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN 13769:2003/prA1	Transportable gas cylinders – Cylinder bundles – Design, manufacture, identification and testing		
Comments from members of the Joint Meeting: Comments from CEN consultant: Decision of the Standards Working Group: Accepted X			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14595	Tanks for transport of dangerous goods - Service equipment for tanks – Pressure and vacuum breather vent		

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
<p>Comments from members of the Joint Meeting:</p> <p>Comments from CEN consultant:</p> <p>Decision of the Standards Working Group: Accepted X</p>			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14596	Tanks for transport of dangerous goods - Service equipment for tanks – Emergency pressure relief valve		

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
<i>Comments from members of the Joint Meeting:</i>			
<u>Germany:</u>			
<p>1. This kind of safety valve is in Germany not in use. Because of lack of information we do not know the accidental behaviour of such emergency valves in the event of an overturning of the tank. Due to the relatively large cross section of the opening of the emergency pressure relieve valve (diameter approx. 250 mm) and the specified venting capacity of the valve and the relatively low opening pressure, we fear that in a case of overturning on the side of the tank an unacceptable large quantity (against the provisions of 6.8.2.2.1 ADR) of the content is released by this type of safety valve.</p>			
<p>We need more information about the release behaviour of this kind safety valve in the event of overturning before we can take a decision about the referencing in ADR.</p>			
<u>Netherlands:</u>			
<p>Although ADR/RID does not require devices with the function of an emergency pressure relief valve (EPRV), the Netherlands is not opposed to the principle. However, the specifications in prEN 14596 are leading to an unsafe design in respect of leakproofness or at least do not contain measures to prevent leakage in accident situations where no relief is required. The Netherlands therefore cannot support the adoption of prEN 14596. In particular the following is taken into account:</p>			
<ol style="list-style-type: none"> 2. The combination of the function of fill hole cover and pressure relief valve leads almost inevitably to a vulnerable construction and should therefore be avoided; 3. Manhole covers with these properties were common in the Netherlands and Germany before approximately 1980, but showed to be the cause of considerable leakage in many accidents and were therefore banned in these countries some time after 1980; 4. Compared with fill hole covers in accordance with EN 13314 and manhole cover assemblies in accordance with EN 13317, as already checked for conformity with RID and ADR and referenced in the 2005 edition of RID and ADR, with basically the same design as the EPRV of prEN 14596, the EPRV is definitely providing a lower level of safety; <ol style="list-style-type: none"> a. In order to ensure leakproofness, even in a rollover situation of a tank to which the closures of EN 13314 and 13317 are mounted, a high design pressure of 2 bar is specified; b. prEN 14596, on the other hand, requires that the minimum venting capacity (= full opening) should be reached at a pressure less than the test pressure of the tank or compartment (i.e. 0.25 – 0.45 bar). The relieving pressure is even (considerably) lower; 5. Where the relieving mechanism may be blocked to prevent premature leakage during testing for leakproofness, similar locking measures against untimely opening during operation are lacking; 6. The blocking of the relieving mechanism during testing makes the result of the test meaningless; 7. As the tanks for which the device is intended are mostly constructed from aluminium alloy, the tank wall above the liquid level tend to melt in full fire conditions, making the necessity of an emergency pressure relief valve for that purpose doubtful; 8. Despite the fact that the proposed prEN does not specify the nature of “emergency” nor what is for instance meant by “exposed area of the tank”, to the Netherlands the conclusion seems to be justified that the device does not fulfil any safety issue required by ADR/RID; 9. As this prEN is primarily intended for tanks with the letter “F” in the ADR tank code, the venting opening of the valve should be protected by a flame arrester. In the case of a combined function as fill hole cover and pressure relief valve this is virtually impossible. The statement in the note at the end of the introduction to the standard that “the emergency pressure relief valve forms part of an ADR venting system,.....” can therefore not be correct; 10. The statement in the same note: “...and shall not be considered as a safety valve as defined in ADR” is not justified; 11. Comparison between Table 1 in 5.4 and the equivalent table in 6.7.2.12.2 of ADR (= UN model regulations) reveals that the values in the prEN are for unknown reasons between 50-70% lower than in ADR/UN; 			
<i>Comments from CEN consultant:</i>			
<ol style="list-style-type: none"> 1. A drop test similar the one included in the standards for the petroleum service equipment is also included in this standard. 2. to 11 : these sounds like technical comments that should have been put forward during the previous stages of approvals (TC and public enquiry) 			
<p>Decision of the Standards Working Group: Rejected X on the ground that several countries (NL, D and UK) requested that the relevant CEN TC reviews the technical comments noted above;</p>			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14334	Inspection and testing of LPG road tankers		
<p><i>Comments from members of the Joint Meeting:</i></p> <p><u>Switzerland:</u></p> <ol style="list-style-type: none"> 1. For the inspection of tanks for the transport of dangerous goods we have already EN 12972 listed in RID/ADR. To avoid confusion and redundancy this new EN 14334 should not be adopted by RID/ADR. Nevertheless we like to mention some points : 2. 3.11"competent person" → this type of person for inspection is not foreseen in the RID/ADR and should therefore not come into operation for inspections in accordance with RID/ ADR. (In addition, the qualification standard for such a person is not specified) 3. 4./Table 1: <ul style="list-style-type: none"> - Intermediate inspection in accordance with RID/ADR include also the tank accessories and the vehicle LPG equipment . - The use of a competent person as mentioned in 3.11 is not accepted 4. 5.3the expression "deemed to impair the integrity..." has to be specified and also the criteria of defects and the possibilities of repair 5. 5.5 The RID/ADR allows, in special cases, a other pressure test than a hydraulic test. Other tests are not foreseen. We dismiss alternative tests without any clear specification about their application and the volume of the tests. 6. 5.8 Any repair and the type and amount of inspection has to be agreed with the approved inspector prior to their execution <p><i>Comments from CEN consultant:</i></p> <ol style="list-style-type: none"> 1. no comment 2. see also definition of inspector in 3.10; 3. – agree, it should be made clearer in table 4.1 what is described in 5.6 as "checking safety operations of all equipment" 4. there is no criteria in EN 12972 either; it is the decision of the "expert" or "inspector" 5. same comment made in assessment form 6. it is understood that it is the "inspector" (approved by the competent authority) who accepts the type of tests to be made after repair <p>Decision of the Standards Working Group: Rejected X on the ground that section 5.5 of the standard needs to be more specific in order to define which NDT (or combination of) are allowed to replace the hydraulic retesting;</p>			