

**ECONOMIC COMMISSION FOR EUROPE**

**INLAND TRANSPORT COMMITTEE**

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the  
Working Party on the Transport of Dangerous Goods  
(Bern, 7-11 March 2005)

**Comments on document TRANS/WP.15/AC.1/2005/23**

**Transmitted by the Government of Sweden**

*Executive summary:* AEGPL have earlier submitted proposals to extend the interval to 15 years between two inspections for certain gases, see TRANS/WP.15/AC.1/2003/7 and INF.23 to the Joint Meeting in Bern, 24-28 March 2003.

Sweden is against the proposal to exclude the competent authorities judicial right to take a stand on the issue to extend the interval, between two inspections, to 15 years for the gases that are comprised by special packing provision 10(v) in P200.

Sweden would also like to attract AEGPL attention to the misleading information concerning the situation in Sweden.

*Action to be taken:* To keep the existing special packing provision 10 (v) in P200 of the RID/ADR 2005.

*Related documents:* TRANS/WP.15/AC.1/2005/23 (AEGPL)  
TRANS/WP.15/AC.1/94 (Secretariat)  
TRANS/WP.15/AC.1/2003/7 (AEGPL).

## Introduction

This matter was also on the agenda at the Joint meeting in March 2003.

As the proposal (TRANS/WP.15/AC.1/2005/23) describes the EN 1440:1996, this standard contains criteria that shall be fulfilled if you are to apply an interval of 15 year.

Sweden has difficulties to connect parts of these criteria to safety. For example:

*“the LPG cylinders are under the control of any LPG marketing organizations responsible for their distribution, filling and maintenance” (from TRANS/WP.15/AC.1/2005/23)*

As soon as the cylinder leaves the care of a gas company there is nothing that prevents a consumer to mistreat a gas cylinder, e.g. throwing it from a roof at a construction site.

*“the cylinders are filled according to EN1439 (already in ADR) or equivalent;” (from TRANS/WP.15/AC.1/2005/23)*

Sweden can only find EN 1439:1996 in another special packing provision 10(ta) in P200, which states “with the agreement of the competent authorities of the countries where the carriage is carried out” and Sweden has not agreed to use special packing provision 10(ta) either.

*“the interval between inspections for welded steel cylinders may be extended to 15 years for cylinders dedicated to the carriage of substances of UN N°1011, 1965, 1075, 1978, ....” (from TRANS/WP.15/AC.1/2005/23)*

The substances mentioned in the proposed text deviates from what the special packing provision 10(v) comprises. Special packing provision 10(v) in P200 of the RID/ADR 2005 comprises the following gases:

UN 1010 BUTADIENES AND HYDROCARBON MIXTURE, STABILIZED  
UN 1011 BUTANE  
UN 1075 PETROLEUM GASES, LIQUEFIED  
UN 1965 HYDROCARBON GAS MIXTURE, LIQUEFIED, N.O.S  
UN 1969 ISOBUTANE  
UN 1978 PROPANE.

(Reference in the proposal is still made to RID/ADR 2003, in the RID/ADR 2005 this special packing provision in question is found in 10(v) of P200).

AEGPL has presented the situation in 12 countries (Sweden and 11 others) but what about the 28 other Contracting Parties to ADR (30 signatory states to COTIF)?

If the proposal from AEGPL is adopted the competent authority in every single Contracting Party, signatory states to COTIF and also the Member State of the EU, loses their possibility to agree or to not agree to extend the interval to 15 year, and also to allow the carriage of these cylinders in their territories.

## **Background**

From the report TRANS/WP.15/AC.1/94:

### **Interval between two periodic inspections for LPG cylinders.**

Document: TRANS/WP.15/AC.1/2003/7 (AEGPL)

Informal document: INF.23 (AEGPL)

77. Several delegations were not in favour of increasing the interval between periodic inspections from 10 to 15 years for LPG steel cylinders, which were inspected in accordance with the standard EN 1440:1996.

78. It was pointed out that before being introduced into RID/ADR, a provision of that nature had to be considered by the United Nations Sub-Committee of Experts.

79. The representative of AEGPL said that he would prepare a new proposal.

The document TRANS/WP.15/AC.1/2003/7 stated incorrectly that the competent authority in Sweden had accepted special packing provision 9(v) in P200, references to RID/ADR 2003, and the standard EN 1440:1996. This was partly corrected by AEGPL in their INF.23 to the same meeting.

Sweden would like to attract AEGPL attention to that this new document, TRANS/WP.15/AC.1/2005/23, again states that Sweden has accepted special packing provision 9(v) and the standard EN 1440:1996.

As the competent authority in Sweden not has agreed to accept special packing provision 9(v) in P200 and to extend the interval to 15 year, the periodical inspection is performed in accordance with the requirements in 6.2.1.6 of the RID/ADR.

Gas cylinders are inspected in accordance with the interval stated in packing instruction P200 for each gas or substance. For the gases in question in the proposal (TRANS/WP.15/AC.1/2005/23) and for all the gases that special packing provision 10(v) in P200 comprises, the interval between two periodical inspections is 10 years.

EN 1440:1996 is not to be found in the in 6.2.2 and Sweden has not separately accepted this standard as one way to comply with the requirements in RID/ADR.

## **Proposal**

Sweden is against the proposal to exclude the competent authorities judicial right to take a stand on the issue to extend the interval, between two inspections, to 15 years for the gases that are comprised by special packing provision 10(v) in P200.

We proposes therefore to keep the existing text of special packing provision 10(v) in P200 of the RID/ADR 2005 which also gives the competent authority the possibility to recognise another technical code or standard.

If something is to be achieved in this matter, the standards EN 1439:1996 and EN 1440:1996 should be submitted to the RID/ADR Joint meeting Standards Working group.

If accepted by the WG Standards and if adopted by the Joint meeting for inclusion in RID/ADR, the EN 1439 should be included in 4.1.6.14 as one way to comply with the requirements of section 4.1.6 and the EN 1440:1996 should be included in 6.2.2 as one way to comply with the requirements of section 6.2.1.6.

If this is performed, the limitation in the column for inspection interval in P200 for the gases that special packing provision 10(v) comprises has to be changed.

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