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Working Party on the Transport of Dangerous Goods

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PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

4.1.6 – Special packing provisions for Class 2: EN ISO standards

Transmitted by the Government of the United Kingdom

Introduction

ISO has withdrawn standard 10297:1999 because it has been replaced by ISO 10297:2006 Transportable gas cylinders - Cylinder valves: Specification and type testing. This new ISO standard is identical to the CEN standard.

Corrigendum ECE/TRANS/185, Vol. I and II, to ADR 2007 accordingly amends the reference to ISO 10297 in the table at 4.1.6.14 against the entry for valves with inherent protection. This anticipates the updating of references to standard 10297 in the 15th Revision of the UN Model Regulations.

A reference to ISO 10297:1999 still however appears in the table at 6.2.5.4. This should also be amended.

In the 2007 editions of the regulations the table in sub-section 4.1.6.14 is preceded by the following text:

For UN pressure receptacles, the ISO standards listed below shall be applied. For other pressure receptacles, the requirements of section 4.1.6 are considered to have been complied with if the following standards, as relevant, are applied:

* Note by the secretariat: As a consequence to the amendments to Chapter 6.2 adopted by the Joint Meeting RID/ADR/ADN, 6.2.5.4 will be renumbered as 6.2.2.3 in ADR 2009 (see ECE/TRANS/WP.15/AC.1/106/Add.2).
This is drafted to convey the mandatory use of standards for UN pressure receptacles and the current voluntary use of standards for other pressure receptacles. In 2009 use of standards will be mandatory in Chapters 6.2 and 6.8.

NB: this paper was originally submitted to the September 2007 Joint Meeting but could not be discussed and a similar proposal will be submitted to the RID Committee of Experts to amend RID.

Proposal


2. Amend the text of the paragraph preceding 4.1.6.14 for ADR 2009 to take account of the mandatory use of standards, as follows:

   For UN pressure receptacles, the ISO standards listed below shall be applied. For other pressure receptacles, the requirements of section 4.1.6 are considered to have been complied with if the following standards, as relevant, are applied:

Justification

ADR should reference current, and not obsolete, standards. The 2009 text should leave no doubt that the use of standards will be mandatory.

Safety

The new standard sets a higher level of safety and should be correctly referenced.

Feasibility

No difficulty.

Enforceability

It is true to say that some valves in circulation will not meet the more stringent requirements of the new valve impact test in the EN ISO standard, but their use will in any case still be permitted by ADR under the transition provision in 1.6.2.5. This provision does not exist in respect of the other modes, which could potentially lead to some infringements of the law. Such an infringement would be very difficult to detect. In practice, however, valve caps or guards are almost always fitted to cylinders in sea and air modes.