REPORTS OF INFORMAL WORKING GROUPS

Corrections to the annexes in the report of the informal working group
ECE/TRANS/WP.15/AC.1/2007/18

Transmitted by the Government of the United Kingdom

Introduction

The United Kingdom supports the proposals in 2007/18 from EIGA but having studied it closely has found a few items requiring correction. Some are purely editorial, but some are more substantive and have an influence on the meaning of the text.

Substantive corrections

1.8.7.7.1 (h), Delete "other applicable regulations" It should not be part of RID/ADR to require declarations of conformity to other unspecified regulations.

6.2.1.3.4 At the end of the first box proposing a change to P200 there is a reference to the “report of the working group paragraph 1.” This is an incomplete reference to the report of the working group given in Joint Meeting paper 2005/47 paragraph 9. The explanation from this previous working group report is reproduced below.

“Paragraph 6.2.1.3.4, suggested amendment to P200 (2) concerning pressure relief devices. The bracketed UN text presents the following problems:

- Which is the country of use, the country where the pressure receptacle is filled or where emptied?

- If individual countries specify that PRDs shall or shall not be used, it will prevent transport of the pressure receptacles in countries which apply differing rules.
If competent authority prescriptions are allowed, then the free use objective of the TPED will be frustrated.

The working group proposes that the existing RID/ADR situation is reserved by deleting the text in square brackets.”.

6.2.2.9 References to 1.8.7.1.1, 1.8.7.1.2, 1.8.7.1.3 and 1.8.7.1.4 should be changed to 1.8.7.2, 1.8.7.3, 1.8.7.4 and 1.8.7.5 respectively.

6.2.3.1.4 Insert "closed" before "cryogenic". This paragraph modifies 6.2.1.1.8.1 which is concerned only with closed cryogenic receptacles.

6.2.3.1.5 This clause should be deleted. 6.2.1.1.9 (introduced in the 15th revision of the UN Model Regulations and included in 2007/18) has the same requirements, making 6.2.3.1.5 redundant.

6.2.3.6 References to 1.8.7.1.1, 1.8.7.1.2, 1.8.7.1.3 and 1.8.7.1.4 should be changed to 1.8.7.2, 1.8.7.3, 1.8.7.4 and 1.8.7.5 respectively.

Annex 3, Introduction After "1790", insert "HYDROFLUORIC ACID with more than 85% hydrogen fluoride". In Annex VI of Council Directive 1999/36/EC of 29.04.1999 on transportable pressure equipment (TPED), reference is made to UN 1790, Class 8, Item 6 which in the unrestructured text of RID/ADR referred to hydrofluoric acid solution with more than 85% hydrogen fluoride. The lower strength solutions of hydrofluoric acid were in item 7. In the restructured text of RID/ADR this higher strength entry equates to the first of the three entries under UN 1790 in Table A of Chapter 3.2.

Editorial corrections

Chapter 1.2 The definition of “Conformity assessment” – delete ‘the’ before ‘type approval’, ‘supervision of manufacture’ and ‘initial inspection and test’;

Chapter 1.2 the second definition of "applicant" should follow on immediately at the end of the first definition of "applicant" and not appear as a separate definition;

1.8.6.4 (f) insert "have a" at the beginning;

1.8.6.4(g) delete "the" before "RID/ADR";

1.8.7 NOTE and 1.8.7.1.1 change “TA4 and TT9 in 6.8.4” to “TA4 and TT9 of 6.8.4”;

1.8.7.1, 1.8.7.2, 1.8.7.4 to be bold italic headings for consistency with the rest of the proposal;

1.8.7.1.3 (d) delete "point";

1.8.7.1.4 change ‘inspection and test’ to ‘inspections and tests’;

1.8.7.1.4 (e) and (g) change "equipments" to read "equipment";
6.2.2.9 for consistency, this paragraph should have a heading. The UK suggests “Equivalent procedures for conformity assessment and periodic inspection and test”. In the second line of the first column of the table, amend “Design type approval” to read “Type approval”;

6.2.3.1.1 in the fourth line, it would be preferable to say "as supplemented or modified by" instead of "as amended by";

6.2.3.6 in the third line of the first column of the table delete “the” in “Supervision of the manufacture”.

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