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INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

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Working Party on the Transport of Dangerous Goods

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Item 6 (a) of the provisional agenda

PROPOSALS OF AMENDMENTS TO RID/ADR/ADN

Pending issues

In-house inspection services, IS(1) and IS(2)

Transmitted by the Government of France

Introduction

1. We believe there has been some confusion in the discussion about the pressure receptacle approval procedures as the limited maximum to 300 bar.l pressure receptacles are concerned. This confusion is linked to the complexity of the directive 99/36/CE (TPED) modules which are not totally in line with the point 6.2.1.4.3 of the RID/ADR 2007 (see it in annex).

2. The current procedures of RID/ADR authorise for the pressure receptacles, which have got limited energy, that the manufacturer performs some operations of the approval procedure without additional requirements :

- 6.2.1.4.3 a) allows that the manufacturer performs the type approval and the supervision of the manufacture without additional requirements under the condition that the initial inspection and tests are performed under the supervision of an independent body.
- 6.2.1.4.3 b) allows that the manufacturer do the supervision of the manufacture and the initial inspection and test without additional requirements under the condition that the type approval has been carried out by an independent body.

So currently, either there is a final control by the independent body in order to check that there is no problem of manufacturing, or there is an a priori control by the independent body in order to assure that the type is conforming to RID/ADR.

This is acceptable only for the pressure receptacles which have got limited energy (less harmful), that means the ones having a test pressure capacity product of not more than 30 MPa.litre (300 bar.litre).

3. France proposes to come back to the system which has been authorised and which is actually in force for these pressure receptacles.

Proposal

4. In 6.2.3.6.1, delete IS(1) and IS(2).

5. In 6.2.3.6.1, introduce a new symbol representing the manufacturer : "M" with the legend :

“ M the manufacturer”.

Introduce a new symbol representing the in-house inspection service : “IS” with the legend :

“ IS means an in-house inspection service with a quality ISO 9001 : 2000 certified system for the appropriate procedure of the table and which quality system is under the supervision of an accredited according to EN ISO/IEC 17020:2004 type A body.

6. Replace the table in 6.2.3.6.1 by the following :

PH·V = Test pressure × water capacity of the pressure receptacles in bar·litres	PH·V ≤ 300		All PH·V values
Type approval (1.8.7.2)	Xa	M	Xa
Supervision of manufacture (1.8.7.3)	M	M	Xa or IS
Initial inspection and tests (1.8.7.4 and 6.2.3.4)	M	Xa	Xa or IS
Periodic inspection (1.8.7.5 and 6.2.3.5)	Xa or Xb or IS		

Comments:

7. The first column means the same as the 6.2.1.4.3 a) of the current ADR 2007 (the A1 and E1 TPED modules). The second column means the same as the 6.2.1.4.3 b) of the current ADR 2007. The third column means the same as the actual situation (quality system of the manufacturer under the surveillance of an independent control body).

Justification

8. This proposal is conform to the ADR and reflects the existing situation.

9. For the P*V limited pressure receptacles, complex procedures with Xa or IS are not adapted on looking at their limited energy contained.

10. For small companies, it is not adapted to require that the in-house inspection service shall be independent from design process, manufacturing operations, repair and maintenance. Because it will mean that an employee must be appointed only for this task, which is not possible for small companies. Furthermore, if the IS is independent from design process, manufacturing operations, repair and maintenance, it would have exactly the same structure that an Xb, which leads to a contradiction (the two are identical but one can perform without the surveillance of Xa and the other not).

Safety

11. The safety level will not be lowered as it is the current situation (no safety problem has been reported with the current approval of pressure receptacle system).

Feasibility

12. No difficulties as the proposal reflects the actual situation (in the ADR countries but also for the European Union – see module A1 for example).

Enforceability

13. No difficulties as the proposal reflects the actual situation.

ANNEX :

6.2.1.4.3 of ADR 2007

- 6.2.1.4.3 The conformity of pressure receptacles, having a test pressure capacity product of not more than 30 MPa.litre (300 bar.litre) with the provisions for Class 2 shall be assessed by one of the methods described in 6.2.1.4.1 or 6.2.1.4.2 or by one of the following methods :
- a) The compliance of any pressure receptacle with a design, fully specified in technical documentation, shall be declared in writing by the manufacturer and pressure receptacles of this design shall be tested under the supervision of a testing and certifying body approved by the competent authority of the country of approval¹; or
 - b) The design type of the pressure receptacles shall be approved by a testing and certifying body approved by the competent authority of the country of approval². The compliance of all pressure receptacles with the approved design shall be declared in writing by the manufacturer and all pressure receptacles of this type shall be tested individually.

¹ If the country of approval is not a contracting party to ADR, the competent authority of a contracting party to ADR.

² If the country of approval is not a contracting party to ADR, the competent authority of a contracting party to ADR.