



**Economic and Social
Council**

Distr.
GENERAL

ECE/TRANS/WP.15/AC.1/2007/20
11 January 2007

ENGLISH
Original: FRENCH

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

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

Bern, 26-30 March 2007
Agenda item 2

TANKS*

6.8.2.6 - Application of standards

Transmitted by the Government of France

SUMMARY

Summary:	The purpose of this document is to clarify the mandatory application of the standards listed under 6.8.2.6.
Action to be taken:	Amend 6.8.2.6, 6.8.2.7, 1.6.3.31 and 1.6.4.9.
Related documents:	ECE/TRANS/WP.15/AC.1/100, para. 5.

* Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2007/20.

Introduction

1. New provisions were inserted in 6.8.2.7 to make it mandatory as from 2009 to apply the standards referred to in 6.8.2.6, which invalidate the national technical codes that may be used under 6.8.2.7 and that should no longer be used under RID/ADR 2009.
2. Various problems have already arisen owing to the introduction of these provisions.
3. The first problem is editorial. The text was adopted in the context of amendments entering into force on 1 January 2007. We believe that both the introductory paragraph of 6.8.2.6 and 6.8.2.7 should be recast for the 2009 version of RID/ADR.
4. Some of the standards in question are currently being revised. This is true for the two main tank construction standards, EN 13094 and EN 14025, and also for the standards for service equipment. This revision was begun with the aim of making a number of corrections and taking into consideration developments in RID/ADR and also experience acquired in using these standards. The new versions of these standards will be available only at the end of 2008. Apart from the difficulty of introducing references to them in RID/ADR 2009, it will also be difficult to ask manufacturers, who will have to carry out major adaptations, to apply the standards as from 1 July 2009. It therefore appears necessary to defer their mandatory application by at least one year.
5. Furthermore, application of some of the standards relating to service equipment may be problematic owing to a sometimes broad definition of their scope. For example, most such standards relate to equipment mounted on tanks with an LGBF tank code, and are inappropriate for the carriage of certain substances such as crude oil, tar and bitumen. We propose that the working group on tanks should consider excluding certain tanks from the mandatory application of these standards.

Proposal

Proposal 1

6. In 6.8.2.6, replace the phrase “The requirements of Chapter 6.8 are considered to have been complied with if the following standards are applied:” with:

“The following standards apply to the construction and equipment and also to the inspection and testing of tanks.”

NOTE. A similar amendment should be made to chapter 6.2 in respect of the mandatory application of standards to gas receptacles.

7. Amend 6.8.2.7 as follows:

~~“Tanks which are not designed, constructed and tested in accordance with the standards set out in 6.8.2.6 shall be designed, constructed and tested in accordance with the provisions of a technical code providing the same level of safety and recognized by the competent authority. Tanks shall, however, comply with the minimum requirements of 6.8.2.~~

~~Where an appropriate standard is referenced in 6.8.2.6 the competent authority shall, within two years, withdraw recognition for the use of any technical code for the same purpose.~~

~~This does not remove the competent authority's rights to recognize technical codes To reflect scientific and technical progress or where no standard exists or to deal with specific aspects not addressed in a standard *listed in 6.8.2.6, the competent authority may authorize the use of a technical code.*~~

The competent authority shall transmit to the secretariat of UNECE a list of the technical codes that it recognizes. The list should include the following details: name and date of the code, purpose of the code and details of where it may be obtained. The secretariat shall make this information publicly available on its website.

For testing, inspection and marking, the applicable standard as referred to in 6.8.2.6 may also be used.”

Proposal 2

8. Amend 1.6.3.31 and 1.6.4.9 as follows:

“Tank-wagons/fixed tanks (tank-vehicles) and demountable tanks and battery-wagons/battery-vehicles/tank-containers designed and constructed before 1 July 2010 in accordance with the technical codes recognized in application of the requirements of 6.8.2.7 applicable until 31 December 2008 may continue to be used.”

Justification

Safety implications: no problem.

Feasibility: no problem.

Enforcement: this amendment is needed to avoid problems of application.
