

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, 8-11 September 2009

Geneva, 14-18 September 2009

Item 2 of the provisional agenda

STANDARDS

Consolidated comments by Members of the Joint Meeting on draft standards dispatched by CEN since the last session

Transmitted by the European Committee for Standardisation (CEN)

1. Reference is made to document ECE/TRANS/WP.15/AC.1/2009/43, which informs about the progress made in the establishment of new and the revision of published EN and EN ISO standards referenced or intended to be referenced in the RID/ADR/ADN. It invites Members of the Joint meeting to comment on draft standards at enquiry and formal vote stage, provided on the dedicated CEN internet-site.
2. Since the last session of March 2009, two dispatches of five draft standards together with assessments by the CEN consultant were made available with deadlines 31 July and 31 August 2009. All comments received are consolidated in this document which will be reviewed by the Joint Meeting Working Group on Standards during the September 2009 session.

A. Standards at Stage 2: Submitted for Public Enquiry

1. Dispatch from CEN on 27. May 2009

prEN 15888	Transportable gas cylinders – Cylinder bundles – Periodic inspection and testing		Where to refer in RID/ADR: 6.2.4.2	Applicable sub-sections and paragraphs: 6.2.3.5	
<p>CEN consultants assessment dated 4.5.2009</p> <p>Summary of conclusions:</p> <p><i>Except for some terms, prEN 15888 complies with the requirements of ADR/RID on bundles of cylinders. It should be promoted to the formal vote stage. Improvements are required to align some wording with ADR/RID, to achieve consistency with EN 14189 and to remove editorial deficiencies. EN 15888 is considered to be a candidate for reference in ADR/RID. It is noted that ADR/RID fail to include some essential requirements to which clauses of the standard could be related.</i></p> <p>Proposed follow-up action:</p> <p><i>EN 15888 is considered to be a candidate for reference in ADR/RID, subsection 6.2.4.2. This judgment is due to the fact that EN 13769 on the design of cylinder bundles is already referenced and the reference would be a valuable contribution and supplement of the regulations, the more as ADR/RID fail to include essential requirements on the subject. This standard is therefore proposed to be discussed by the Standards Working Group of the Joint Meeting as a possible reference in ADR/RID.</i></p>					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		This standard will be welcome since there is no standard currently covering periodic inspection of bundles of cylinders. Subject to the comments on the standard below, it is suitable for referencing.		Agree	
CH		The cylinder bundle is defined in RID/ADR 1.2 on two occasions. One is mentioned in the assessment of the CEN consultant, but the more important one is: "Pressure receptacle means a collective term that includes cylinders, tubes, pressure drums, closed cryogenic receptacles and bundles of cylinders". Therefore all the requirements of RID/ADR for pressure receptacles have to be used also for cylinder bundles. So 6.2.1.1.6 and 6.2.1.6.1 are not only "for information"!		Thanks for guidance.	
UK	Title	The title should refer to bundles of cylinders to align with the defined term of the RID/ADR		Supported	Agreed
UK	Intro- duction, 3 rd para.	the Directive 89/655 is know as Use of Work <u>Equipment</u>		Correct. Full title is: "COUNCIL DIRECTIVE of 30 November 1989 concerning the minimum safety and health re- quirements for the use of	Agreed

			work equipment by workers at work (...) (89/655/EEC)		
UK	Clause 5.1	In his comments, the CEN Consultant states that RID/ADR does not require type approval for bundles of cylinders. However, bundles of cylinders are pressure receptacles by the definition of pressure receptacles in 1.2.1, and therefore they are required to undergo type approval in accordance with 6.2.2.5 for UN or 6.2.3.6 for non UN. EN 13769 defines the necessary technical requirements and tests. The maximum period between periodic inspection and tests is therefore defined by P200. Also, since they are pressure receptacles, they are subject to stamp marking in accordance with 6.2.2.7 and 6.2.3.9. (A paper from EIGA – 2009/30 – proposes removing unnecessary marking requirements for bundles.)		As indicated above, I was not aware of the inclusion of bundles of cylinders in the definition of pressure receptacles.	Clarified; no change required.
UK	Clause 5.6, 2 nd para., 2 nd sent.	The meaning is not clear; this sentence should be amended to read “If new valves are fitted <u>they shall conform to the original type approval of the bundle</u> shall be maintained. ”		Supported.	Proposed amendment supported.
UK	Clause 5.6, 3 rd para.,	Visual inspection of the manifold shall be required in all cases. The first sentence should be changed as follows. “ Where necessary, The manifold shall be visually inspected <u>and where necessary, cleaned and degreased.</u> ”		Supported.	Proposed amendment supported.
CH	5.6, 3 rd para., last sentence	As the manifolds are parts of the pressure containing compartment, they should be pressure tested in the same way as cylinders.		Supported.	The Std’s WG agrees that the manifolds of bundles of cylinders shall be subject to the pressure test. Justification: A bundle as a whole is a pressure receptacle which has to be pressure tested in accordance with RID/ADR 6.2.3.5/6.2.1.6.1. As the manifold is a pressure bearing part it has to be tested accordingly. Another justifications is that this amendment would align the standard with the provisions on battery vehicles (>450 l) which

				- acc. to the limits for the capacity could also be bundles of cylinders (< 3000 l).
UK	Clause 6, 1 st sent.	<p>We agree with the CEN Consultant's suggestion for extra words explaining the position of the "plate".</p> <p>We think the reference intended here is EN ISO 13769 since EN 13769 has no requirements for periodic inspection marking. However, this sentence should be changed to align with the resolution taken by CEN/TC23 i.e.</p> <p>"Stamp marking shall be in accordance with the requirements of the current version of RID/ADR/ADN and with EN ISO 13769. The requirements of RID/ADR/ADN shall override conflicting requirements of this standard."</p> <p>This sentence applies equally to the second sentence of clause 6 and is more relevant since EN ISO 13769 shows where to apply the Pi mark, which RID/ADR does not. We suggest the above quoted sentence is moved to the end of the clause deleting other references to RID/ADR and EN 13769 so that it applies to both periodic inspection and reassessment.</p>	Yes, this was the agreement.	<p>The WG supports a clarification of the term "the plate" by amending the sentence similar to "... the plate specified in EN 13769, clause 6.3.1, ..."</p> <p>This proposal is strongly supported. It will lead to a consistent and agreed approach for all design standards which include marking clauses.</p>
CH	7	The labelling must be in accordance with the requirements of the appropriate transport regulation.	This underlines the UK-proposal above.	The WG supports this proposal to replace the reference to ISO 7225 by a reference to RID/ADR/ADN. The third paragraph will then become redundant and can be deleted.
UK	Bibliography, 1 st entry	Correct to read "Use of Work <u>Equipment</u> Directive 89/655 as amended by Directive 95/63 as implemented into national legislation in countries where Air Products Europe operates within the European Union". It would be sufficient if it read "Use of Work Equipment Directive 89/655 as amended by Directive 95/63"	Supported.	Correction supported.

prEN ISO 11114-1:2009	Transportable gas cylinders - Compatibility of cylinder and valve materials with gas contents - Part 1: Metallic materials (ISO/DIS 11114-1:2009)	Where to refer in RID/ADR: 4.1.4.1, P200 and 4.1.6.14	Applicable sub-sections and paragraphs: 6.2.1.2
<p>CEN consultants assessment dated 8.5.2008</p> <p>Summary of conclusions:</p> <p><i>The text of this version of prEN ISO 11114-1:2009 conforms to the provisions of ADR/RID. It should be promoted to the formal vote stage.</i></p>			

Proposed follow-up action: <i>This standard needs to be discussed by the STD's WG as an updated reference in subsection 6.2.4 ADR/RID.</i>					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		<p>We agree with all the points made by the CEN Consultant in his assessment. The standard is entirely suitable and appropriate for inclusion in the regulations. This new version updates the information on compatibility and has strengthened the terminology on incompatible gas/material combinations from “not recommended – a material/gas combination that may not be safe” to the more stringent “not acceptable – a material/gas combination that is not safe under all normal conditions of use”.</p> <p>The new agreed text on type approvals has removed the current version of this standard from 6.2.4, but it is still referenced in 6.2.2 and P200 and 4.1.6.14. However, the standards working group may like to know that the UK submitted a draft proposal (INF.51) to the last meeting of UN SCoE-TDG which amends those references in the Model Regulations, effectively to make this standard more clearly guidance on how to meet the compatibility requirements, but not overriding the special packing provisions of the P200.</p>		<p>./.</p> <p>Initiative supported</p>	<p>No change required.</p> <p>In view of the essential amendments in the new version of this standard the WG underlines the need that the amendments are indicated in the foreword of the revised standard (as it is required by the CEN rules anyway).</p>
CH		<p>It was decided that material standards will no longer be part of the table in 6.2.4.</p> <p>The EN version instead of the ISO version of this standards should be referenced in P200 where these standards (11114-1 and -2) are mentioned in (10) and in 4.1.6.14.</p> <p>But these entries may also be questioned.</p>		<p>May be covered by the UK initiative mentioned above.</p>	<p>A reference of EN ISO 11114-1 in 4.1.4.1, P200 and 4.1.6.14 is supported by the WG.</p>

prEN ISO 11114-3:2009	Transportable gas cylinders - Compatibility of cylinder and valve materials with gas contents – Part 3: Autogenous ignition test for non-metallic materials in oxygen	Where to refer in RID/ADR: Reference not supported	Applicable sub-sections and paragraphs: -/-
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atmosphere (ISO 11114-3:2009)					
<p>CEN consultants assessment dated 8.5.2008</p> <p>Summary of conclusions: <i>The text of this version of prEN ISO 11114-3:2009 conforms to the provisions of ADR/RID. It should be promoted to the formal vote stage. The Joint Meeting need to decide whether this Part shall be taken into reference in addition to the other three Parts of the standard.</i></p> <p>Proposed follow-up action: <i>This standard needs to be discussed by the STD's WG as a candidate to be referenced in subsection 6.2.4 ADR/RID. If a reference is denied then the existing reference to Part 4 is questioned.</i></p>					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		This is a material test standard. It does not do more than enable a comparative assessment of the candidate materials' susceptibility to react with oxygen. The results are of great assistance to designers of oxygen equipment when selecting materials, but the standard has no direct relationship with the requirements of RID/ADR. We agree with the CEN Consultant that it should not be referenced in the RID/ADR.		./.	The WG agrees that this part of the standard as a material test standard shall not be referenced in RID/ADR. With this justification, the existing reference to Part 4 of the standard in RID/ADR, 6.2.4, is questioned and its deletion (as decided by the Joint Meeting in March 2009) confirmed.
CH	Title	In the EN version the part "for non metallic materials" is missing		Correct; need to be amended.	Agreed.
CH		We do not see any need to put this standard in RID/ADR		Agree. In addition, if this Part will not be referenced, the existing reference to Part 4 is questioned.	Agreed; see above.

2. Dispatch from CEN on 14. July 2009

prEN ISO 11120:2009	Gas cylinders – Refillable seamless steel tubes of water capacity between 150 l and 3000 l – Design construction and testing (ISO 11120:2009)	Where to refer in RID/ADR: 6.2.4	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4
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CEN consultants assessment dated 23.7.2009

Summary of conclusions:

There is no clause in prEN ISO 11120:2009 which would contradict the relevant provisions of RID/ADR. However, it doesn't address all RID/ADR provisions related to the construction and testing of pressure tubes adequately. In line with the EN ISO 9809 standard series a European Annex is considered as indispensable.

It should not be promoted to the formal vote stage.

It is required that the enquiry is repeated after the text of ISO 11120 has been brought up to the stage of the ISO 9809 standard series.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as a replacement of the existing reference in 6.2.4 RID/ADR.

Comments from members of the Joint Meeting:

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH		In the assessment we are missing the provisions of section 6.2.3		6.2.3.1.1 is referring back to 6.2.1; 6.2.3.1.2 is covered by clauses 7.1 and 7.2; 6.2.3.1.3 isn't relevant for seamless tubes; 6.2.3.1.4 is relevant to closed cryogenic receptacles only.	Clarified; no consequence for the following comments. .
CH		On ISO 13769 stamp marking, it was only agreed, that the present version 2007 complies with the current RID/ADR. Therefore only this standard can be used and only in connection with RID/ADR 2009. It therefore should be excluded when mentioning this standard.		Adequate text need to be added in an European Annex.	The WG refers to the earlier decision to include the following paragraph to design standards for pressure receptacles and tanks: "Stamp marking shall be in accordance with the requirements of the current version of the current version of RID/ADR/ADN and with EN ISO 13769. The requirements of RID/ADR/ADN shall override conflicting requirements of this standard."

CH		General remark: This standard gives much more clarity on production control. It therefore should be taken into RID/ADR as soon as possible		Agree.	Agreed.
UK	General	The comments of the CEN consultant supported, particularly the need for EN annexes		./.	Agreed.
UK	6.1.4 Note and 10.2.2 Note	The references to Clause 0 to be corrected	Clauses 11.7 to 11.12	Correct; agree.	Agreed.
CH	8.5.6	The water capacity should never been below the design capacity. +/-5% is not acceptable.		Adequate text need to be added in a European Annex.	See next line.
<p>The WG realizes that clause 8.5.6 is part of chapter 8 Construction and workmanship and addresses the accuracy of the manufacturing process in terms of geometrical properties. The background for the difference of tolerances for cylinders for compressed and liquefied gases in 8.5.6 is seen in commercial reasons. From a safety perspective it is understood that the tolerances included in clause 8.5.6 are not related to the precision of the marked actual volume (three significant figures ...) for mark "(j)" according to the marking provisions of RID/ADR/ADN. To avoid misunderstanding it is recommended adding a Note similar to: "Note: These tolerances do not relate to or affect the accuracy required by RID/ADR for the stamp marking of the actual volume of the tube."</p>					
UK	11.6 and 11.7	The second (unfinished) sentence of 11.6 should be the heading of 11.7	Replace "General" as the heading of 11.7 by "Special requirements for tubes for embrittling gases": delete these words in 11.6.	Correct; agree.	.Supported
UK	11.7	It is unclear which of the following paragraphs are "the following requirements". The previous standard had all these requirements in one clause (11) and this was much clearer than adding it to the clause applicable to all other tubes.	Replace "following requirements" with "requirements of 11.8, 11.9, 11.10 and 11.12" or make 11.7 to 11.12 a new clause 12.	Supported.	WG in favour of second proposal to create a new clause 12 "Special requirements for embrittling gases" comprising clauses 11.7 to 11.12.
UK	General	The requirements of this version of EN ISO 11120 represent only incremental changes not affecting conformity of the type with the latest applicable version of RID/ADR. The new standard is easier to use in an RID/ADR context since it now has a specific type approval procedure.	Type approvals according to EN ISO 11120:1999 should be valid until their expiry.	Supported.	Supported.

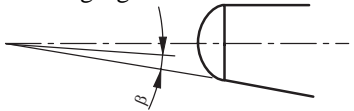

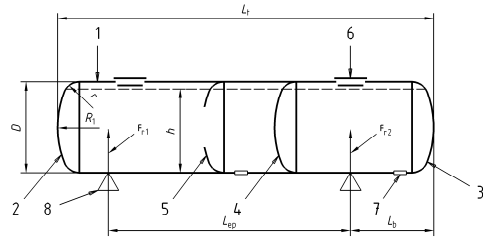
B. Standards at Stage 23: Submitted for Formal vote

2. Dispatched by CEN from 14.7.2009

prEN 12663-2	Railway applications - Structural requirements of railway	Where to refer in RID:	Applicable sub-sections and paragraphs:
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vehicle bodies - Part 2: Freight wagons		6.8.4, TE 22			
<p>Assessed by CEN consultants Jean-Claude Tourrade and John Snell from 12.7.2009</p> <p>General overview:</p> <p><i>"This prEN 12663-2 is based on:</i></p> <ul style="list-style-type: none"> - EN 12663: 2000 for the load cases for freight wagons; - UIC-577 "Wagon stresses", ERRI B12/RP17 "Programme of stresses to be carried out on wagons with steel underframe and body structure", ERRI B12/RP60 "Regulation for proof tests and maximum permissible stresses" for the assessment method for freight wagon bodies and associated specific equipment; - UIC-573 "Technical conditions for the construction of tank wagons" for the assessment of wagons with crashworthy buffers." <p>Summary of conclusions:</p> <p><i>"Its content meets the Requirement for a Standard agreed by ERA in order to allow the withdrawal of annexes from the CR RST TSI Freight Wagon and to define the special requirements created for the wagon body by the use of crashworthy buffers specified by RID."</i></p>					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH		It must be clarified, that the recommendations of UIC 573, Annex F, are fully incorporated in this standard. This standard should only be mentioned (if necessary) in TE 22, as suggested §3 of this document. The final version (published) must be available.		The "Interoperability"-Consultants confirm this compliance. Ref. in TE 22 has been proposed by CEN. Formal vote will terminate on 22 December 2009.	WG takes note that the Joint Meeting has allocated this subject to the RID TVTWG.
UK	General	The RID TVTWG has already adopted an amendment to the end of 6.8.4(b) TE22 by making reference to Section 7 of EN 15551 in relation to energy absorption that is integrated into crashworthy buffers. The alternative deemed compliance in relation to the wagon still refers to UIC leaflet 573 pending publication of EN 12663-2 containing the equivalent provisions. So RID has accepted the principle of reference to EN 12663-2. As well as the references in the Standard in Sections 6.3 and 8.2.5.3 as mentioned in 2009/43, Section 8.2.1 refers to Class 2	These matters and the best wording of the proposed amendment can be discussed in the Standards WG.	Propose that this issue is discussed again by the RID TVTWG	

	of RID. In this connection there is a reference to Category A buffers, which was also discussed in the RID TVTWG and does not appear to be correct; there is also the issue of the alternative of calculation instead of testing.			
Decision of the STD's WG:	Accepted Refused Postponed	Comments: See right column. The STD'S WG supports a reference to EN 15551 in combination with EN 12663-2 as it has been suggested in ECE/TRANS/ WP.15/ AC.1/2009/43, No. 3.		

EN 13094:2008 +AC:2008	Tanks for the transport of dangerous goods - Metallic tanks with a working pressure not exceeding 0,5 bar - Design and construction	Where to refer in RID/ADR: 6.8.2.6	Applicable sub-sections and paragraphs: 6.8.2.1		
Correction of Figure A.1 Main tank characteristics (not relevant to the German issue.)					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CEN	A.5.2.1, Figure A.1 Main tank characteristics	Existing figure in EN 13094:2008  Replacement in EN 13094+AC:2008:  		Indispensable for understanding of the characteristics of a tank shell, subject to calculation.	The WG realizes that the corrigendum AC:2008 to EN 13094:2008 is correct in all details and should be referred to in ADR 2011 as a replacement of EN 13094:2008 without any transition regulation - see proposed amendment in separate report of the Std's WG, September 2009 The WG is aware of the fact that the drawing dispatched by CEN was faulty and the UK comments are not relevant, therefore.

UK	Figure A.1	As a replacement for the current Figure A.1, it is a great improvement. However, (a) the symbols do not match Table A.1 (see row below) and (b) there is no key for the numbers in the figure.		To be considered for the edited version for printing.	
UK		Figure A.1 L B Ep R1 R2 R	Table A1 L _t L _b L _{ep} F _{r1} F _{r2} R ₁		
Decision of the STD's WG:		Accepted Refused Postponed	Comments		