

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	
UK	Introduction, 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 requirements for the use of	

				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.	
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 shall be maintained.</u> ”		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</u> , cleaned and degreased.”		Supported.	
CH	5.6	As the manifolds are parts of the pressure containing compartment, they should be pressure tested in the same way as cylinders.		Supported.	
UK	Clause 6, 1 st sent.	We agree with the CEN Consultant’s suggestion for extra words explaining the position of the “plate”. 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. "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." 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.		Yes, this was the agreement.	
CH	7	The labelling must be in accordance with the requirements of the appropriate transport regulation.		This underlines the	

			UK-proposal above.	
UK	Bibliography, 1 st entry	Correct to read “Use of Work Equipment 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.	

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: 6.2.4	Applicable sub-sections and paragraphs: 6.2.1.2
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CEN consultants assessment dated 8.5.2008

Summary of conclusions:

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.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as an updated reference in subsection 6.2.4 ADR/RID.

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</p>		<p>./.</p> <p>Initiative supported</p>	

		provisions of the P200.			
CH		It was decided that material standards will no longer be part of the table in 6.2.4. 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. But these entries may also be questioned.		May be covered by the UK initiative mentioned above.	

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 atmosphere (ISO 11114-3:2009)	Where to refer in RID/ADR: 6.2.4	Applicable sub-sections and paragraphs: 6.2.1.2
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CEN consultants assessment dated 8.5.2008

Summary of conclusions:

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.

Proposed follow-up action:

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.

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.		./.	
CH	Title	In the EN version the part "for non metallic materials" is missing		Correct; need to be amended.	
CH		We do not see any need to put this standard in RID/ADR		Agree. In addition, if	

				<p>this Part will not be referenced, the existing reference to Part 4 is questioned.</p>	
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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:

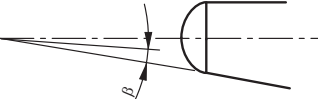

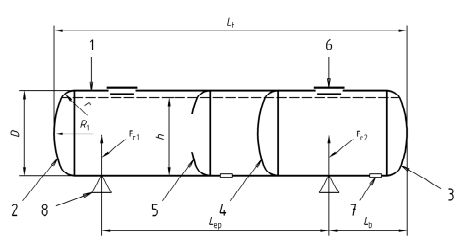
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH		In the assessment we are missing the provisions of section 6.2.3		6.2.3.1.1 is referring back to 6.2.1; 6.2.3.1.2 is covered by clauses 7.1 and 7.2; 6.2.3.1.3 isn't relevant for seamless tubes; 6.2.3.1.4 is relevant to closed cryogenic receptacles only.	
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		Adequate text need to be added in an European Annex.	

		RID/ADR 2009. It therefore should be excluded when mentioning 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.	
CH	8.5.6	The water capacity should never been below the design capacity. 1/-5% is not acceptable.		Adequate text need to be added in an European Annex.	

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 vehicle bodies - Part 2: Freight wagons		Where to refer in RID: 6.8.4, TE 22	Applicable sub-sections and paragraphs:	
<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 <u>crashworthy buffers specified by RID.</u>"</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.	
Decision of the STD's WG:	Accepted Refused Postponed	Comments			
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.	
Decision of the STD's WG:	Accepted Refused Postponed	Comments			