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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

Geneva, 23-26 March 2009
Item 3 of the provisional agenda

STANDARDS
Information on work in progress in CEN

Transmitted by the European Committee for Standardisation (CEN)

1. With reference to the Document ECE/TRANS/WP.15/AC.1/2009/1 where CEN listed all standards proposed for comments, the CEN consultant has received comments from UK, Switzerland and Germany, which are collated in the Appendix to this document. The related standards and assessments from the CEN consultant have been made available on the dedicated CEN website as notified by email and letter, dated 4 September (1st dispatch), 20 November (2nd dispatch) and 15.12.2008 (3rd dispatch).

2. The Appendix will be used by the members of Standards Working Group (STD's WG) during their "off-sessions" meetings to elaborate proposals to the Joint Meeting.

3. Pending issues from earlier sessions: Delegates are made aware that the Standards Working Group didn't accomplish to prepare recommendations on standards referencing in a number of cases due to various obstacles. Those may have been removed meanwhile and conclusions could be drawn. This concerns the following items:

- Amend existing reference to ISO 11117:1998 by EN ISO 11117: 2008 Gas cylinders – Valve caps and valve guards – Design, construction and tests (see JM Report March 2008 Session, item #18 and STD's WG report, INF 37, para. 2 and again in para. 5 of STD's WG report, Sept. 08, INF 31),
- Amend existing reference to EN 13082:2001 by EN 13082:2008 Tanks for transport of dangerous goods — Service equipment for tanks — Vapour transfer valve (as above),
- prEN 12245 Transportable gas cylinders - Fully wrapped composite cylinder: postponed recommendation (see STD's WG report INF. 12rev.2 from September 2008),
- prEN 15507 Packaging - Transport packaging for dangerous goods - Comparative material testing of polyethylene grades: postponed recommendation (see STD's WG report INF. 12rev.2 from September 2008),
- prEN 1626 Cryogenic vessels - Valves for cryogenic service: postponed recommendation (see STD's WG report INF. 12rev.2 from September 2008),
- prEN 13648-1 Cryogenic vessels - Safety devices for protection against excessive pressure - Part 1: Safety valves for cryogenic service: postponed recommendation (see STD's WG report INF. 12rev.2 from September 2008).

A. Standards at Stage 2: Submitted for Public Enquiry

2. Dispatch from CEN on 20 November 2008

prEN 12561-1		**Railway applications - Tank wagons - Part 1: Identification plates for tank wagons for the carriage of dangerous goods**	Where to refer in ADR/RID: **Reference questionable**	Applicable sub-sections and paragraphs: **6.8.2.5, 6.8.3.5; RID only**	
CEN consultants assessment dated 10.12.2008					
Comments from members of the Joint Meeting:					
Coun-try	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	Parts 1 to 8 in general	We would agree with the CEN Consultant's assessments that none of these Standards is considered a candidate to be referenced in RID. We also agree with the general comments made, in particular the conclusions of earlier assessments which have been endorsed as still valid. The Standards may well benefit some industry in that they can ensure uniform dimensions and positioning of equipment but generally they do not deal with the safety aspects of tank wagon equipment used for dangerous goods as addressed by RID. Often the type of equipment will be specified in detail rather than providing a performance specification, e.g. leak-proofness, so that there is little scope to reflect technical developments in equipment design or alternative designs. As an example, see the specific comments on prEN 12561-2 below. Now that the Standards referenced in RID are mandatory, this exacerbates the shortcomings and problems with these Standards.		-/-	
UK	General to Part 1	It had been previously agreed that marking for tank wagons for dangerous goods should be dealt with by TC256 and hence currently EN12972 only deals with tank plates for road tank vehicles and tank containers (and portable tanks). We would tend to agree with the CEN Consultant's recommendation that this prEN should not be promoted to the formal vote stage and that this subject should now be dealt with by EN12972 to ensure a consistency of approach for the tank plates for road tank vehicles, tank containers and tank wagons.		Suppose UK is proposing that CEN TC 296 should deal with the subject.	
CH	General to Parts 1-6	In general it is said that at the moment these standards contain too many errors and ambiguities and to less substance. In addition the first 6 parts could have been incorporated in only one standard. Therefore the whole package as it stands now will be dismissed by CH.		To be considered by CEN TC 256/ WG 20	

		Diese Normreihe beinhaltet zu viele Fehler, Unklarheiten und zu wenig Substanz. Alle 6 Teile hätten in einem Dokument Platz gefunden. Wir lehnen deshalb dies Normen als ganzes Paket ab.			
CH	General to Part 1	In der Norm EN 12972 "Tanks für die Beförderung gefährlicher Güter - Prüfung, Inspektion und Kennzeichnung von Metalltanks", die für Bahnkesselwagen anwendbar ist, wird auf die Norm EN 12561-1 verwiesen. Leider stimmt die Numerierung in beiden Normen nicht überein und die Angabe bezüglich Charaktergröße auch nicht (EN 12972: 3 mm; EN 12561: 4 mm). Auf dem Kennzeichnungsschild nach der Norm stehen andere Ausdrücke als im RID/ADR unter 6.8.2.5.1: - "Fassungsvermögen" - "Fassungsraum" - "externer Berechnungsdruck" - "äusserer Auslegungsdruck" - "Rauminhalt" - "Fassungsraum". Was bringt die Angabe vom Berechnungsdruck (12) auf dem Schild von BKW für flüssige und feste Stoffe? Im RID ist dieser Wert auf dem Schild nicht verlangt.	**Consultants translation:** EN 12561-1 is referenced in EN 12972 … applicable also to rail tank wagons. Unfortunately, marking details differ between both standards, such as the size of marking characters (EN 12972:3 mm, EN 1256: 4mm.) Marking elements on tank plate are differently termed in the standard compared with RID/ADR 6.8.2.5.1 ((examples may relate to the German version only)). What is the use of the indicated design pressure? RID doesn't require this item.	Either concordance between both standards is achieved or both standards are merged. To be edited. Technical question. In principle, additional marking elements are not prohibited.	
CH	Clause 5	Im Kap. 5 heißt der Titel "Kennzeichnungsschilder für flüssige und feste Stoffe" und im Kapitel 1 "Anwendungsbereich" heißt es, dass die Norm (außer für verflüssigte Gase) für Stoffe...im flüssigen Zustand gilt. Verwirrend!	The title of clause 5 „Marking plates for liquid and solid substances" where Clause 1, Scope declares the standard applicable for liquid substances (except liquefied gases) – confusing!	To be edited.	

prEN 12561-2		**Railway applications - Tank wagons - Part 2: Bottom emptying devices for liquid products including vapour return**	Where to refer in ADR/RID: **Reference questionable**	Applicable sub-sections and paragraphs: **6.8.2.2; RID only**	
CEN consultants assessment dated 10.12.2008					
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	General to Part 2	6.8.2.2.3 of RID uses the term "self-operating ventilation valves". It is unfortunate that a different term "auto vent valve" is used in this Standard for the same piece of equipment. Tank wagons in Britain use hardly any of the fittings described in the Standard, nor are they usually located in the positions shown. The current fittings would have to continue to be used in the current positions as they are compatible with the loading and discharge terminals and in some many cases are considered to be superior and safer than the fittings described. For example paragraph 5.1 c) of the standard prescribes a threaded connection at the end of each branch pipe, whereas quick acting or self-sealing dry break coupling arrangements are used here, particularly within the petroleum industry which facilitate a more efficient and leak free transfer system. Figure 3 prescribes the positioning and dimensioning of the equipment in the middle of the tank wagon. In Britain two T – pieces with branch pipes are fitted on bogie tank wagons (located towards each bogie) to fit in with the arrangements within terminals and to provide the required discharge capacity to meet service turnaround times and wagon utilisation requirements.		Alignment of terms supported. Technical issue, to be dealt with in CEN TC 256/ WG20	
CH	Fig.1	Warum sind die Schraubkappen auf Bilder 1 & 2 nicht referenziert. Sie sind im RID unter 6.8.2.2.2 vorgeschrieben.	Why are the screw caps in Figures 1 & 2 not referenced? They are subject to RID 6.8.2.2.2.	Completion of the KEY to be considered.	
CH	5.2 b) and e)	"Das innen liegende Bodenventil muss bodenbedienbar sein…" "Wenn das innen liegende Bodenventil bodenbedienbar ist,…" Diese Formulierung ist unglücklich!	The wording in the two subparagraphs is arbitrary: b) The …valve shall be ….e) If the valve is ….	To be edited.	
CH	5.5	Wo befinden sich die Erdungsplatten auf Bild 3?	Where are the earthing plates on Figure 3?	Amendment of the Figure suggested.	
CH	10 and 11	Inhaltlich schwach!!!	Weak contents!	-/-	

prEN 12561-3		**Railway applications - Tank wagons - Part 3: Bottom filling and emptying devices for gases liquefied under pressure**	Where to refer in ADR/RID: **Reference questionable**	Applicable sub-sections and paragraphs: **6.8.2.2, 6.8.3.2; RID only**	
CEN consultants assessment dated 10.12.2008					
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	1	Der Anwendungsbereich sollte sich nach RID richten. Im RID spricht man von "verflüssigten Gasen", wobei 2 Kategorien definiert werden: unter hohem und unter geringem Druck verflüssigte Gase. Welche Gase sind in dieser Norm gemeint? Wenn beide Kategorien, dann sollte der Ausdruck "unter Druck" verschwinden. Warum hat man in dieser Norm nicht ebenfalls oben liegenden Öffnungen (z. B. Chlortanks) berücksichtigt?	The Scope should comply with RID, which specifies „liquefied gases“ in two categories - gases liquefied under high and low pressure -. Which gases are meant in the standard? If both categories are included, then the term “under pressure” should disappear. . Why do top openings have been considered in this standard (i.e. for chlorine tank wagons)?	Alignment with RID preferable. To be considered for the evolution of the standard series.	
CH	4.1	Die Rohre des Gasphasensystems sollen wie diejenigen des Flüssigphasensystems DN 80 sein, aber die Kupplung muss eine DN 50 Nennweite aufweisen. Angeblich entspricht das der heutigen Praxis. So kann man Fehlanschlüsse vermeiden, aber es ist technisch betrachtet ungünstig. Schade, dass die Norm kein besseres System vorschlägt.	It is required the diameter of the gas phase as well as the liquid phase- pipework shall be of DN 80. However the couplings shall be of DN 50. It is said that this corresponds to the real situation to avoid wrong coupling. However, this is an unfortunate solution from a technical standpoint. It is a pity that the standard doesn’t provide for a innovative solution.	May be considered for the evolution of the standard.	
CH	5.3	Wie ist es möglich, dass es Unterschiede gibt zwischen diesem Text und dem Text des § 5.2 (a) des Teils 2 ? Diese Bemerkung gilt eigentlich nicht nur für (a)!!!	What is the reasoning for the differences between Clause 5.3 and the text of Clause 5.2 (a) in Part 2? This remark is not only valid for (a)!!	Consistent wording recommended.	

prEN 12561-4		**Railway applications - Tank wagons - Part 4: Top devices for top emptying and filling of liquid products**	Where to refer in ADR/RID: **Reference questionable**	Applicable sub-sections and paragraphs: **6.8.2.2; RID only**	
CEN consultants assessment dated 10.12.2008					
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	General	Inhaltlich sehr schwach.	Very weak contents.	-/-	
CH	4.1	Erster Satz nicht verständlich.	First sentence couldn’t be understood.	To be edited.	

prEN 12561-5		**Railway applications - Tank wagons - Part 5: Top devices for bottom emptying and top filling of liquid products**	Where to refer in ADR/RID: **Reference questionable**	Applicable sub-sections and paragraphs: **6.8.2.2; RID only**	
CEN consultants assessment dated 10.12.2008					
Comments from members of the Joint Meeting:					
Coun-try	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	General	Inhaltlich noch schwächer als Teil 4.	Contents even weaker then Part 4.	-/-	
CH	4.2	4.2 behandelt Mannlöcher. Man versteht nicht, wieso es in dieser Normreihe einen Teil 6 (nicht unterbreitet) für Mannlöcher gibt.	Clause 4.2 deals with manholes. It isn't understood why there is a Part 6 on manholes, in parallell.	Clause 4.2 is questioned and may be moved to Part 6	
CH	Figure 1	die Nummern der Legende wurden auf der Zeichnung nicht eingetragen. Vergessen?	The item numbers of the key have not been added to the drawing. Forgotten?	To be edited	

prEN 12561-6		**Railway applications - Tank wagons - Part 6: Manholes**	Where to refer in ADR/RID: **Reference questionable**	Applicable sub-sections and paragraphs: **6.8.2.2**	
CEN consultants assessment dated 10.12.2008					
Comments from members of the Joint Meeting:					
Coun-try	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
		No comments.			

prEN 12561-7		**Railway applications - Tank wagons - Part 7: Platforms and ladders**	Where to refer in ADR/RID: **no reference**	Applicable sub-sections and paragraphs: **none**	
CEN consultants assessment dated 10.12.2008					
Comments from members of the Joint Meeting:					
Coun-try	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	General to Part 7	We agree with the CEN Consultant that there are no requirements in RID relating to the subject matter of these Standards and therefore they do not need to be discussed by the Standards Working Group.		-/-	

prEN 12561-8		**Railway applications - Tank wagons – Part 8: Heating connections**	Where to refer in ADR/RID: **no reference**	Applicable sub-sections and paragraphs: **none**	
CEN consultants assessment dated 10.12.2008					
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	General to Part 8	We agree with the CEN Consultant that there are no requirements in RID relating to the subject matter of these Standards and therefore they do not need to be discussed by the Standards Working Group.		-/-	

3. Dispatch from CEN on 15.12.2008

prEN ISO 10156		**Gases and gas mixtures - Determination of fire potential and oxidizing ability for the selection of cylinder valve outlets (ISO/DIS 10156:2008)**	Where to refer in ADR/RID: **2.2.2.1.6**	Applicable sub-sections and paragraphs: **6.2.2.1.6**	
CEN consultants assessment dated 15.12.2008					
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	General	This standard is used for classification in a part of the regulations where ADR/RID/ADN follows from the UN text.	Await the adoption of this standard by the UNSCoE-TDG in the 17th revised edition.	Agree.	
UK	Foreword	The ISO Directives require that the Foreword contains a statement of significant technical changes; this is absent, although partially covered in the Introduction.	Add statement of significant technical changes. N.B. Section 5 is completely new.	Supported.	
UK		The DIS is closed and there are many pages of comments and corrections from the member standards bodies.		Result to be awaited-	
CH	General	… agree with CEN consultant		-/-	

B. Standards at Stage 3: Submitted for Formal Voting

1. Dispatch from CEN on 4.9.2008

prEN 12807:2008		**LPG equipment and accessories – Transportable refillable brazed steel cylinders for liquefied petroleum gas (LPG) – Design and construction**	Where to refer in ADR/RID: **6.2.4**	Applicable sub-sections and paragraphs: **6.2.3.1 and 6.2.3.4**	
CEN consultants assessment dated 25 August 2008					
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	10	It must be clear that, in accordance with the recommendations of the CEN consultant, this standard is only for 6.2.3.1 and 6.2.3.6 and not for 6.2.3.9 (marking). Therefore the normative reference of EN 14894 must be excluded in the Table of 6.2.4.		A general agreement on how to deal uniformly with marking standards should be achieved.	
Decision of the STD's WG:		**Accepted** ☐ **Refused** ☐	**Comments:**		

3. Dispatch from CEN on 15.12.2008

prEN ISO 13769		**Gas cylinders - Stamp marking (ISO 13769:2007)**	Where to refer in ADR/RID: **Reference questionable**	Applicable sub-sections and paragraphs: **6.2.3.9**	
CEN consultants assessment dated 15.12.2008					
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	Fourth comment in the table at the end of Consultant's assessment	The non-conformity noted by the Consultant 'Manufacturers identification' should be 'manufacturer's mark registered with the competent authority' is non-conformity with the UN text in the original ISO. It is not the task of the EN annex to correct what is only a minor error in the ISO text. Also, the non-conformity is not going to cause confusion and since all manufacturers know which mark should be applied.	None Suggest the change in the next revision by ISO.	Agree.	
UK	Final comment in the table at the end of Con-	The inclusion of "reassessed" here would be wrong. The point the standard writers are making is that the Pi mark applied during manufacture should go in position 27, but for reassessment, which is by definition done long after all manufacturing and	None	Persuaded!	

	sultant's assessment	certification marks have been applied there will be no room here because the marks are applied close together. Hence the Pi mark must be placed at position 22.			
UK	Topic for discussion References to this standard in EN standards	It is proposed to change the EN standards so that they no longer rely only on EN ISO 13769, but require stamping in accordance with the regulations. ISO has resolved to deal with this by including a Note after the reference to ISO 13769 as follows. "NOTE Attention is drawn to requirements for marking in relevant regulations that might override the requirements given in this International standard." A proposal for text in ENs is shown in the next column. Because of the intention to continue to produce EN ISO standards, we cannot commit to regular updates as have CEN/TC 286, and therefore we have to accept that discrepancies between the regulations and the standard can arise.	"Stamp marking shall be in accordance with the requirements of the current version of ADR/RID and with EN ISO 13769:2009. The requirements of ADR/RID shall override conflicting requirements of this standard."	Agree to find a general agreement on how to deal uniformly with marking standards.	
CH	General	It has been discussed several time that it is not necessary to have this standard reverenced in RID/ADR. Further more, the working group on "Period of validity of type approvals and transitional measures for standards" writes in Doc 2009/3: *"14. For the rows in the table containing EN 13110 to EN 13769 column (3) indicates that the standard meets the requirements of 6.2.3.9 Marking of refillable pressure receptacles. In the view of the working group, this reference to 6.2.3.9 should be removed. The regulations give specific instructions on marking and should be consulted. The standards are unlikely to remain in agreement with the regulations; for example, there is a pending proposal for the 16th revision of the UN Model Regulations for marking bundles of cylinders which will change the requirements."*		As above	
CH	Annex Z	The stamp marking number 22 must be placed after the RID/ADR marking of the periodic test (no interference with standard RID/ADR marking). TPED Annex IV, Part 3, Module 1/3.2 says:"The inspection body must affix its identification number or have it affixed to each product being periodically inspected immediately after the date of periodic inspection…."		RID/ADR 6.2.2.7.5 (acc. to 6.2.3.9.1 also valid for non-UN cylinders) includes no requirement of the sequence with "other marks" as long as they don't conflict with the required marks. New TPED will regulate π-marking now in Article 13(6).	
D	Annex Z Key 8	It should be made clear that the "inspection stamp" is the "identity mark or stamp of the inspection body that is registered with the competent authority of the country authorizing the marking" (6.2.2.7.1 (d) RID/ADR).	Add this clarification from the regulation (6.2.2.7.1 (d)) in the NOTE 1.	To be edited.	

Decision of the STD's WG:	**Accepted** ☐ **Refused** ☐	**Comments:**

prEN 15551	**Railway applications – Railway rolling stock – Buffers**	Where to refer in ADR/RID: **6.8.4, TE 22**	Applicable sub-sections and paragraphs: **6.8.4, TE 22**	
CEN consultants assessment dated 15.12.2008				
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	General	We agree with the CEN Consultant's comments on this Standard and its likely suitability for referencing in RID (however see comment below regarding L.2 d))		-/-	
UK	Annex L last paragraph of L.2 b)	Reference is made to L.2 d) in relation to additional tests, yet no L.2 d) exists in the Standard.		To be edited	
UK	CEN Consultant's suggested addition to Foreword	It is suggested that it would be helpful to mention the elements of RID which the standard addresses. This could be done by an addition to the sentence "The standard has been submitted for reference into the RID."	The standard has been submitted for reference into the RID in relation to crashworthy buffers for tank wagons.	-/-	
UK	CEN Consultant's suggested addition to Clause 7	The note should be added in Clause 7 (not 9). The English of the second sentence of the second paragraph (penultimate sentence of the Note) is unclear and an alternative is given in the next column.	"This may lead to temporary non-compliances of EN 15551 with RID."	-/-	
CH	Annex L	In TE22 the minimum energy to be absorbed is at least 800kJ per end. In the standard in Annex L (in accordance with RID?) the total energy that can be absorbed is ≥ 400kJ or ≥ 250 kJ. How is this comparable? Is it necessary to have this standard referenced in RID? Where should it be placed?		Annex L specifies energy absorption per buffer (not per end). I declared EN 15551 as candidate to be referenced under 6.8.4 RID.	
Decision of the STD's WG:	**Accepted** ☐ **Refused** ☐	**Comments:**			