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Item 5 (a) of the provisional agenda

Proposals of amendments to RID/ADR/ADN: pending issues

Proposal for changing the provisions of 6.2.3.6.1 regarding separate conformity assessment of pressure receptacles

Transmitted by the European Cylinder Makers Association (ECMA)^{1,2}

Summary

Explanatory summary: The current version of RID/ADR/ADN 6.2.3.6.1 permits a separate conformity assessment of the valve from the receptacle for all types of pressure receptacles.

There should be one exception for *non-refillable* gas cylinders where the valve is an integral part of the design which makes the cylinder actually non-refillable, and it is important that the conformity assessment for such pressure receptacles is carried out as an assembly.

The revised text of directive 1999/36/EC, as amended (TPED directive) has already taken into account this situation by limiting the separate conformity assessment to *refillable pressure receptacles* and it is proposed to align RID/ADR/ADN with the “new” TPED.

Action to be taken: Add the words: “For refillable pressure receptacles ...” in front of the paragraph below the table in 6.2.3.6.1.

Related documents: ECE/TRANS/WP.15/AC.1/2010/16; New text of the TPED directive; Informal document INF.41 submitted at the Spring 2010 session

¹ In accordance with the programme of work of the Inland Transport Committee for 2006-2010 (ECE/TRANS/166/Add.1, programme activity 02.7 (c)).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2010/46.

Introduction

1. Currently ECMA has discovered safety issues with non-refillable gas cylinders put on the European market where the valves and cylinders have been separately conformity assessed which resulted in non-compliance with the standards. This separate conformity assessment is currently possible according to RID/ADR/ADN (6.2.3.6.1) and the “old” TPED (EC Directive 1999/36/EC).
2. Non refillable gas cylinders in Europe are normally designed and constructed in accordance with EN 12205 and these cylinders are equipped with valves to EN ISO 13340, which is a mandatory requirement of the cylinder design standard. But the valve standard is currently not referenced in RID/ADR/ADN. Other than a refillable gas cylinder a non refillable cylinder has to be equipped with a non-reusable valve, inseparably fitted to the cylinder in order that it is not exchangeable and consequently the cylinder must be unable to be refilled.
3. This circumstance is the reason why ECMA has submitted paper ECE/TRANS/WP.15/AC.1/2010/16 to the last RID/ADR/ADN Joint Meeting in Bern 2010 which was considered by the Working Group on Standards. In accordance with its report – informal document INF.41, paragraph 2.2, – the Working Groups recommended the adoption of EN ISO 13340. A corresponding decision shall be taken at the September 2010 meeting. The Working Group on Standards also supported the ECMA initiative to align RID/ADR/ADN with TPED and to allow separate conformity assessment for refillable pressure receptacles only.
4. At its meeting on 11 and 12 March 2010 the Council of the European Union agreed to the text of the proposed “new” TPED where in Article 12 paragraph 3 the separate conformity assessment is limited as follows:

“For demountable parts of refillable transportable pressure equipment a separate conformity assessment may be carried out.”
5. ECMA therefore proposes to align the provisions of RID/ADR/ADN (6.2.3.6.1) with the text of TPED.

Proposal

6. Amend the text following the table of 6.2.3.6.1 as follows (amended text underlined):

“For refillable pressure receptacles the conformity assessment of valves and other accessories having a direct safety function may be carried out separately from the receptacles and the conformity assessment procedure shall be at least as stringent as that undergone by the pressure receptacle to which they are fitted.”
7. *Justification:* This simple change will eliminate safety problems currently encountered with separately approved non-refillable gas cylinders and their valves.
8. *Safety:* Currently there are safety concerns with non-refillable cylinders which are approved independently from the valves. If an unsuitable valve is fitted to such an approved cylinder it may happen that the cylinder becomes refillable.
9. *Feasibility:* No problems are expected.
10. *Transitional period:* not necessary.
11. *Enforceability:* no problems are expected.