Cross-reference in P200 - Difference between RID and ADR

Note by the secretariat

Introduction

1. The introductory sentence of packing instruction P200 reads as follows: “Cylinders, tubes, pressure drums and bundles of cylinders are authorised provided the special packing provisions of 4.1.6 and the provisions listed below under (1) to (11) are met.”. In RID, only the provisions listed under (1) to (9) are indicated in the corresponding sentence.

2. The provisions listed under (1) to (11) are:
   (1) to (3) General provisions
   (4) to (7) Test pressure, filling ratios and filling requirements
   (8) and (9) Periodic inspections
   (10) Special packing provisions (Contains the text of the special packing provisions provided in Table 1, Table 2 and Table 3).
   (11) Corresponding standards

3. Paragraph (12) contains the provisions to be applied to have the advantage of a 15 year interval for the periodic inspection of refillable welded steel cylinders.

4. A new paragraph (13) is introduced in the amendments for ADR 2015. Paragraph (13) contains the provisions to be applied to have the advantage of a 15 year interval for the periodic inspection of seamless steel and aluminium alloy cylinders.

5. Paragraphs (12) and (13) are introduced by special provisions listed in (10).

Proposal

6. Except in the introductory sentence as written in ADR 2013, there is no formal requirement to apply the special packing provisions listed in (10). It seems that the reference to (10) should be kept.

7. Paragraphs (11), (12) and (13) contain additional provisions which need not be met for the authorisation of the cylinders, tubes, pressure drums and bundles of cylinders. They should not be listed in the introductory sentence.

8. The secretariat proposes to amend to introductory sentence as follows:

“Cylinders, tubes, pressure drums and bundles of cylinders are authorised provided the special packing provisions of 4.1.6, the provisions listed below under (1) to (9) and, when referred to in the column "Special packing provisions" of tables 1, 2 or 3, the relevant special packing provisions listed below under (10), are met.”.