

OTIF



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Working Party on the Transport of Dangerous Goods
(Berne, 18 - 22 March 2013)

Item 3 of the agenda: Standards

Section 6.2.4: Form of references to standards

Transmitted by Germany

SUMMARY

<i>Executive summary:</i>	Some references to standards are ambiguous in terms of the scope described in the standard. This results in different interpretations of the applicability of standards for approval within the framework of RID/ADR.
<i>Action to be taken:</i>	Clarify the meaning of the scope of standards in the references in the regulations; formulate amendments to the references to standards.
<i>Related documents:</i>	ECE/TRANS/WP.15/AC.1/2013/14 – OTIF/RID/RC/2013/14 (CEN)

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Introduction

1. The application of a standard is determined by the scope defined in the regulations and the restrictions stipulated therein. This is illustrated in particular by the way in which reference is made to standards for UN pressure receptacles in 6.2.2. In this section, information and restrictions regarding the application of the standard are provided in a relatively large number of cases in addition to the specific description of the relevant pressure receptacles.
2. The wording of the references in 6.2.4 does not specify the type of pressure receptacle, its minimum or maximum capacity or other aspects. Thus, in 6.2.4 only the title of a standard can describe its scope.
3. In Germany, this resulted e.g. in not being able to apply standard EN 12245 to tubes, as the title only contains a reference to cylinders (up to 150 litres). Based on this principle, the scope mentioned in the title of the standard (150 l) and not the scope described in the standard itself (450 l) was considered as the mandatory limitation of the application. As a result, Germany considered it necessary to draw up and recognise technical codes for the resulting gaps. These codes have been notified to the OTIF and UNECE Secretariats:
 - ATR D 2/10
Recognized technical code (Anerkanntes Technisches Regelwerk, ATR) for the construction, equipment, test, approval and marking as transportable pressure equipment of composite tubes with a seamless, hoop-wrapped and load sharing liner made of metallic materials, of a working pressure not exceeding 50 MPa (500 bar) and a water capacity not exceeding 450 l
 - ATR D 3/10
Recognized technical code (Anerkanntes Technisches Regelwerk, ATR) for the construction, equipment, test, approval, and marking as transportable pressure equipment of composite tubes with a seamless, load sharing aluminium liner and a working pressure not exceeding 500 bar and a water capacity not exceeding 450 l
 - ATR D 4/10
Recognized technical code (Anerkanntes Technisches Regelwerk, ATR) for the construction, equipment, test, approval, and marking as transportable pressure equipment of composite tubes with a non-load sharing plastics liner with a working pressure not exceeding 500 bar and a water capacity not exceeding 450 l
4. However, other Member States arrived at another interpretation of the scope of standard EN 12245.
5. For other standards, e.g. EN 13322-1:2006, the same consideration resulted in the conclusion that the standard needed to be applied more comprehensively than described in the scope of the standard. In the standard, a minimum capacity of 0.5 litres is specified. However, as there is no longer a minimum capacity for cylinders following the restructuring, this standard with the term "cylinder" in its title would officially have to be applied to cylinders with a capacity of 0 to 150 litres.
6. Moreover, there are many standards whose titles contain minimum capacities and which would thus require the recognition of a technical code in the absence of a technical justification.
7. With a view to the new approaches as regards higher pressures, particularly for tubes in MEGCs etc., it should also be considered how the uncertain interpretation regarding capacity, as described above, affects the issue of pressure.

It should be noted that until the restructuring of RID/ADR, with a view to the consequences, the requirements for approval, for valid safety-related reasons, were dependent on the pressure volume product.

Proposal

8. Germany proposes that the aspects of references to standards be discussed and that, depending on the results of this discussion, the form of the references be revised. One possible result could also be to ask CEN to consider the principles established by the Joint Meeting, if any, in the regular revision of the standards.
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