

# OTIF



ORGANISATION INTERGOUVERNEMENTALE POUR  
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES

ZWISCHENSTAATLICHE ORGANISATION FÜR DEN  
INTERNATIONALEN EISENBAHNVERKEHR

INTERGOVERNMENTAL ORGANISATION FOR INTER-  
NATIONAL CARRIAGE BY RAIL

INF. 30

11 March 2013

Original: German

## RID/ADR/ADN

Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods  
(Berne, 18 - 22 March 2013)

### Item 2 of the agenda: Tanks

#### Alignment of approval and inspection procedures for tanks for substances of Class 2 and tanks for substances of classes 3-6, 8 and 9

#### Transmitted by the International Union of Wagon Keepers

### Background

1. In informal document INF.6 at the RID/ADR/ADN Joint Meeting on 25 – 28.3.2008, UIP proposed that the approval and inspection procedures for tanks for substances of Class 2 be aligned with those for tanks for substances of classes 3-6, 8 and 9.
2. The approach underlying UIP's document was as follows:
  - to take account of the European approach (far-reaching powers for the inspection bodies) for tanks for substances of classes 3-6, 8 and 9,
  - to achieve clear responsibilities regarding approval and inspection of these tanks,
  - to prevent duplicate approvals for tanks which are used for the transport of gases of Class 2 and substances of classes 3-6, 8 and 9.
3. In the discussion in the Joint Meeting's Tank Working Group, UIP's proposal was basically considered to be useful and positive. However, the proposal did not obtain a majority, because at the time, the RID/ADR transposition of the new procedures regarding gases of Class 2 (transposition of the TPED in the EU Member States, new regulations in RID/ADR regarding inspection bodies and conformity assessment) had not been completely finalised and because, according to the experts, there was no experience of applying the new procedures.
4. Extract from document ECE/TRANS/WP.15/AC.1/110/Add.1 – OTIF/RID/RC/2008-A/Add.1 (report of the Tank Working Group):

For reasons of cost, only a limited number of copies of this document have been made. Delegates are asked to bring their own copies of documents to meetings. OTIF only has a small number of copies available.

***“Item 3: Informal document INF.6 (UIP) – Alignment of approval procedures for tanks transporting Class 3-6, 8 and 9 substances with the rules in the new sections 1.8.6 and 1.8.7***

9. *After lengthy discussion, the working group decided that it needed more time to be able to assess the consequences of applying TPED procedures to tanks for liquid substances. While the UIP proposal was advantageous on a free market (in terms of certification and testing, for example), application of the new rules would increase manufacturers’ costs.*
10. *No majority emerged in the working group. UIP was invited to draw up a new proposal with more substantive information or with a more detailed justification. The European Commission was also invited to set out the reasons for its support in a separate document.”*
5. The procedures for the application and implementation of the TPED were finally adopted in the 2011 edition of RID/ADR and described in 1.8.6 and 1.8.7, which deal with the approval and inspection of tanks and containers for gases of Class 2.
6. A fundamental revision of Chapter 6.8 was not carried out. This was criticised in a proposal from Italy submitted to the meeting of the standing working group of the RID Committee of Experts (Riga, 12 – 15 November 2012) (document OTIF/RID/CE/GTP/2012/10). In this proposal, Italy asked Germany and UIP to check the terminology concerning approval and inspection in Chapter 6.8 of RID/ADR (with special emphasis on the experts referred to there) and to submit a proposal to align with current procedures (see report OTIF/RID/CE/GTP/2012-A, paragraph 33).

### **Proposal**

7. UIP is of the view that adopting the procedures of the old TPED in RID/ADR has been successful and that the procedures according to 1.8.6 and 1.8.7 have been tried and tested. There are no shortcomings in terms of safety, because the risk potential of tanks for substances of Class 2 and the resulting safety level is far better than that of tanks for other classes.
8. This is why UIP wishes to return to the discussion to align the procedures for the approval and inspection of tanks for gases of Class 2 with those for the transport of substances of classes 3-6, 8 and 9 in the context of informal document INF.6 from the Joint Meeting in March 2008. The Joint Meeting’s Tank Working Group is asked to discuss this topic and to assess alignment of these procedures.

### **Implementation**

9. If the Joint Meeting can agree to this basic objective, UIP is prepared to propose texts to a future meeting to take account of these objectives.
10. UIP believes that it makes sense to delete the current approval requirements in Chapter 6.8 of RID/ADR and to apply 1.8.6 and 1.8.7 to all tanks. This would
  - ensure uniform procedures for all tanks,
  - define clear regulations and responsibilities and
  - bring up to date the present RID/ADR terminology regarding inspection bodies and experts (in accordance with the decision of the RID Committee of Experts’ standing working group).
11. UIP would be happy to accept any kind of support (advice or active cooperation) to prepare a harmonising proposal.