
Economic Commission for Europe

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

14 March 2014

Bern, 17–21 March 2014

Item 5 (a) of the provisional agenda

Proposals for amendments to RID/ADR/ADN:

Pending issues

Comments on document ECE/TRANS/WP.15/AC.1/2014/7

Transmitted by the Government of France

Introduction

1. We agree with Belgium and Germany on the principle that according to 1.8.6.4.1, testing tasks can be delegated to testing laboratories which in the case of a separate accreditation need only be accredited in accordance with standard EN ISO/IEC 17025:2005.
2. Such testing laboratories are only allowed to perform mechanical testing tasks required in the design standard; they are not allowed to perform assessment activities or, initial or periodic tests required by the regulation. That is why we don't understand some reference of the proposed paragraphs of section 1.8.7 where no testing tasks are performed but where only tests required by the regulation are listed (1.8.7.4.2 and 1.8.7.5.1).
3. Testing tasks are carried out only in the case of the type approval and the supervision of manufacture. They are linked to the sentence dealing with "the location where the examinations and necessary tests" are to be carried out [1.8.7.2.2 (e) and 1.8.7.3.3 (e)].
4. We agree to refer to 1.8.7.2.2 but we don't agree to refer to 1.8.7.4.2 and 1.8.7.5.1 where the listed tests -can only be performed by the inspection body accredited in accordance with standard EN ISO/IEC 17020:2012 (except n° 8.1.3).
5. A future work should be done to check the wording "testing – test" ("essais – épreuves" in French) used in 1.8.7 which probably explains some misunderstanding.

Proposal

6. Modify the proposed text to insert after the first sentence of RID/ADR 1.8.6.4.1 (text deviating from INF 19 ~~sticker out~~*in italics*):

"... a third-party testing laboratory in order to perform testing tasks in accordance with 1.8.7.2.2 (b) and (e), 1.8.7.4.2 (a) and 1.8.7.5.1 (b), **and 1.8.7.3.3 ...**"