Comments on document 2014/40: Interpretation of standards

Transmitted by the Government of France

Introduction

1. During the March 2014 session of the Joint Meeting, the Working Group on tanks discussed INF.30 from Sweden and to avoid misinterpretation on the application of standards, proposed to delete the subheadings in the Table under 6.8.2.6.1 of RID/ADR. The Joint meeting decided to postpone the decision.

2. We thank Sweden to come back on this question in document 2014/40 which proposes to simplify the above Table but also deals with Table under 6.2.4.1 applicable to non-UN receptacles.

3. The subheadings in 6.2.4.1 are related to general purpose “for design and construction” and “for closures” which are based on what appears in section 6.2.2 applicable to UN receptacles. They may help the user looking for a referenced standard and they don’t conflict with the scope of the standards. That is why we consider the Table under 6.2.4.1 should not be modified.

4. The subheadings in 6.8.2.6.1 are different and as explained in paragraphs 8 and 9 of document 2014/40 may conflict with the scope of some standards. They could be simply deleted. However based on what appears in Chapter 6.2, we consider that some subheadings may help to read the Table. This proposal could be discussed in the Working Group on tanks.

Proposal

5. In the Table under 6.8.2.6.1, delete the existing subheadings and introduce the two following subheadings:

“For design and construction,
For equipment “.