

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

Bern, 23–27 March 2015

Item 3 of the provisional agenda

Standards

13 March 2015

Comments and suggestions concerning paper ECE/TRANS/WP.15/AC.1/2015/17

Transmitted by the Government of the United Kingdom

Summary

Executive summary: This paper requests that the objectives of the Standards Working Group are clarified and suggests that the current practice should be confirmed. It also proposes amendments to the text preceding the lists of mandatory standards with the intention of giving users of standards a better understanding of the rules they must follow.

Introduction

1. The United Kingdom welcomes paper 2015/17 from CEN since it shares the concerns expressed by CEN that further clarification is necessary in the regulations and in the operation of the Standards Working Group following the interpretation of the role of standards given at the Joint Meeting last March.
2. The first three bullet points of paragraph 3 of paper 2015/17 are feasible inferences from the decision last March, but run counter to what the Standards Working Group (SWG) seek to achieve when assessing standards. It is therefore requested that the Joint Meeting confirms that the standards proposed by the SWG for reference shall meet the following criteria:
 - Address in full all the requirements included in column (3) of the various tables of standards;
 - Either contain no contradictions of other provisions of RID/ADR, or exclude any such contradictions from the reference.
3. The current texts accompanying the mandatory standards tables in 6.2.4.1 and 6.8.2.6.1 link the process of type approval to standards and this leads to the misconception noted in paragraph 5 of paper 2015/17, i.e. that it is sufficient to follow only the standard when issuing a type approval. We therefore support the suggestion made in paragraph 7 to remind the reader that the type approval is about conformity to the RID/ADR, not just the standard. Our proposal below expands this idea by referring to the rules for type approvals, namely 1.8.7 and, in the case of tanks to which TA4 and TT9 of 6.8.4 do not apply, 6.8.2.3.

4. Also, although the existing texts declare that the requirements of Column (3) prevail over the standard, there is a need to state this principle for all other requirements of RID/ADR and so a reference to 1.1.5 has been added to the texts for type approval and for periodic inspection. The reference to 1.1.5 also clarifies the role of the normative references in the standards.

Proposal

5. Add the underlined text and delete the crossed out text to the first paragraph of 6.2.4.1.

Type approval certificates shall be issued in accordance with 1.8.7. The standards referenced in the table below shall be applied for the issue of type approvals as indicated in column (4) to meet the requirements of Chapter 6.2 referred to in column (3). ~~The requirements of Chapter 6.2 referred to in column (3) shall prevail in all cases.~~ The standards shall be applied in accordance with 1.1.5. Column (5) gives the latest date when existing type approvals shall be withdrawn according to 1.8.7.2.4; if no date is shown the type approval remains valid until it expires.'

6. Add the underlined text and delete the crossed out text to the first paragraph of 6.2.4.2.

The standards referenced in the table below shall be applied for the periodic inspection and test of pressure receptacles as indicated in column (3) to meet the requirements of 6.2.3.5 ~~which shall prevail in all cases.~~ The standards shall be applied in accordance with 1.1.5.

7. Add the underlined text and delete the crossed out text to the first paragraph of 6.8.2.6.1.

Type approval certificates shall be issued in accordance with 1.8.7 or 6.8.2.3. The standards referenced in the table below shall be applied for the issue of type approvals as indicated in column (4) to meet the requirements of Chapter 6.8 referred to in column (3). ~~The requirements of Chapter 6.8 referred to in column (3) shall prevail in all cases.~~ The standards shall be applied in accordance with 1.1.5. Column (5) gives the latest date when existing type approvals shall be withdrawn according to 1.8.7.2.4 or 6.8.2.3.3; if no date is shown the type approval remains valid until it expires.

8. Add the underlined text and delete the crossed out text to the first paragraph of 6.8.2.6.2.

The standard referenced in the table below shall be applied for the inspection and test of tanks as indicated in column (4) to meet the requirements of Chapter 6.8 referred to in column (3) ~~which shall prevail in all cases.~~ The standard shall be applied in accordance with 1.1.5.

9. Add the underlined text and delete the crossed out text to the first paragraph of 6.8.3.6 – (ADR only).

Type approval certificates shall be issued in accordance with 1.8.7. The standard referenced in the table below shall be applied for the issue of type approvals as indicated in column (4) to meet the requirements of Chapter 6.8 referred to in column (3). ~~The requirements of Chapter 6.8 referred to in column (3) shall prevail in all cases.~~ The standards shall be applied in accordance with 1.1.5. Column (5) gives the latest date when existing type approvals shall be withdrawn according to 1.8.7.2.4; if no date is shown the type approval remains valid until it expires.