
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

25 March 2015

**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**Agreed comments by participants of the Joint Meeting on
draft standards dispatched by CEN since the last session****Transmitted by the European Committee for Standardisation (CEN)**

1. Reference is made to document ECE/TRANS/WP.15/AC.1/2015/14, which informs about the progress made in the development of new or revised EN and EN ISO standards referenced or intended to be referenced in the RID/ADR/ADN. It invites Members of the Joint Meeting to comment on the compliance of draft standards at enquiry and formal vote stage with regulations of RID/ADR/ADN.
2. Since the last session to which CEN could attend (March 2014), standards at enquiry and formal vote stage as well as related assessments by the CEN Consultant (when available) were made available on the dedicated CEN webpage.
3. In absence of budget line for CEN Consultant no telecons could be organized by CCMC early 2015. Comments from MS were compiled by CCMC (Annex below).
4. Unresolved issues are intended to be discussed and final conclusions to be agreed during the March session week of the Joint Meeting.
5. In absence of CEN Consultant the Joint Meeting, CEN will ask the Joint Meeting to appoint one of its delegate to chair the WG Standard during this session. CEN will offer the secretariat support to this Joint Meeting WG Standard.

Annex

A. Standards at Stage 2: Submitted for Public Enquiry

Dispatch 3

prEN 13807		Transportable gas cylinders - Battery vehicles - Design, manufacture, identification and testing	Where to refer in RID/ADR:	Applicable sub-sections and paragraphs:	
WI 023180					
Assessment by CEN Consultant on Sept 2014 This standard needs to be discussed by the STD's WG as a replacement to the existing standard EN 13807:2003 referenced in subsection 6.8.3.6 of RID/ADR.					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CCMC	Comment from WG Standards
UK	General	CEN Consultant's assessment agreed. This can go forward to the FV stage.			
CH	Scope	Amend	If there is any conflict between this standard and the provisions of ADR, the provisions of ADR take precedence.		Comment accepted. To be inserted in the Foreword.
CH	3	Terms and definitions The meaning of the reference to EN ISO 10286 is not clear			Terminology standard will possibly be transferred in bibliography.
CH	3	Terms and definitions Definitions in the regulations should not be repeated or reworded e.g. 3.1 battery vehicle, 3.2 cylinder, 3.3 tube, 3.4 bundle of cylinders, 3.18 competent authority			duplication of definition of the RIDADR – is it necessary? CEN/TC 23 to consider.
CH	3	Inspector Use the same expression as proposed in EN 12972:2014	Expert individual or body approved by the competent authority to perform designated		to be aligned with EN 12972 CEN/TC 23 to decide.

			inspections and tests NOTE 1 to entry: According to RID/ADR testing, inspection and certification duties are allocated to either the competent authority or to inspection bodies or experts approved by the competent authority. RID and ADR include detailed requirements on the qualification, obligations, accreditation and approval of these inspection bodies.		
CH	6.3	Battery vehicle filling identification Amend the note	NOTE At time of publication of this document, marking requirements for battery vehicles can be found in Chapter 6.8.3.5.10 and 6.8.3.5.11 ADR		Accepted
CH	8.2	Documentation Add a reference to ADR (tank record)	NOTE At time of publication of this document, requirements for tank records can be found in Chapter 4.3.2.1.7 ADR		Accepted

Dispatch 2

prEN ISO 20421-2	Cryogenic vessels - Large transportable vacuum-	Where to refer in	Applicable sub-sections and paragraphs:
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WI 268056	insulated vessels - Part 2: Operational requirements (ISO/DIS 20421-2:2013)		RID/ADR: 6.8.2.6.2	6.8.2.4.2, 6.8.2.4.3, 6.8.2.4.4 AND 6.8.3.	
<p>Assessment by CEN Consultant on 5.2.2014 (Dispatch 2)</p> <p>Summary of conclusions</p> <p><i>Major elements of the RID/ADR provisions related to the scope of the standard are not or not adequately covered by the standard.</i></p> <p><i>One of the normative references - EN ISO 204421-1 - has the potential to conflict with RID/ADR. It needs to be assessed for compliance with RID/ADR prior to the approval of EN ISO 20421-2.</i></p> <p><i>European modifications are required, if this standard is intended for reference in RID/ADR, chapter 6.8. If the standard should be limited to portable tanks acc. to RID/ADR chapter 6.7 then it is no candidate for reference.</i></p> <p>Follow-up action by the Joint Meetings STD's WG</p> <p><i>This draft standard shall be discussed as a candidate for reference in RID/ADR, paragraph 6.8.2.6.2 and related to paragraphs 6.8.2.4.2, 6.8.2.4.3, 6.8.2.4.4 and 6.8.3.</i></p>					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CCMC	Comment from WG Standards
UK	Gen	This standard will replace EN 13530-3:2002. Although EN 13530-2:2002 + A1:2004 is referenced for tank construction, we have never considered referencing Part 3. If we were to reference this EN ISO standard, it would only be to support periodic, intermediate and exceptional inspection. However, the added value of the standard's clause 15 is minimal. The TC should consider the CEN Consultant's recommendations and ensure conformity with the regulations.	My preference is to not add this standard to the references in RID/ADR; the regulations and EN 12972 cover inspection adequately and this EN ISO adds too little to earn a place in RID/ADR.		TC should take into account the comments from the CEN consultant. WG standard does not recommend to reference this standard in the ADR.
DE	Gen	Standards about operational requirements/instructions should not be mentioned in RID/ADR as mandatory standard. There can be a conflict with national laws.			See above

Dispatch 3

prEN ISO 21013-3 rev16631	Cryogenic vessels - Pressure-relief accessories for cryogenic service - Part 3: Sizing and capacity determination (ISO/DIS 21013-3:2014)	Where to refer in RID/ADR:	Applicable sub-sections and paragraphs:
WI 268060			

Assessment Consultant: 15th Dec 2014 <i>This draft essentially complies with the related provisions of RID/ADR and doesn't include contradictory regulations. It can be promoted to the FV stage.</i>					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CCMC	Comment from WG Standards
UK	General	CEN Consultant's recommendations supported. This standard should remain as a normative reference in the standards referenced in RID/ADR – not itself be referenced in RID/ADR			TC should take into account the comments from the CEN Consultant. No contradiction with the regulation but recommend that it is used as a normative reference in the construction standard. Not to be referenced directly in the RIDADR.

Dispatch 2

prEN 1442 rev	LPG equipment and accessories - Transportable refillable welded steel cylinders for LPG - Design and construction	Where to refer in RID/ADR: 6.2.4.1	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4
WI 286153			
Assessment by CEN Consultant on 9.12.2014 (Dispatch 2) Summary of conclusions: <i>This draft essentially complies with the related provisions of RID/ADR and doesn't include contradictory regulations. Improvements are recommended, in particular with respect to over- moulded cylinders. It can be promoted to the FV stage..</i> Follow-up action by the Joint Meetings STD's WG: <i>This standard needs to be discussed by the STD's WG as an addition to the existing reference to EN 1442:1998 +AC:1999, EN 1442: 1998 + A2:2005 and EN 1442:2006 + A1:2008 in RID/ADR 6.2.4.1, Table, and related to subsections 6.2.3.1 and 6.2.3.4.</i>			

Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from	Comment from

				CCMC	WG Standards
UK	General	Agree the CEN Consultant's comments. This can go forward to the FV stage.			
CH	General	We agree with the CEN consultant but as the over moulded cylinders are specified in RID/ADR, all part concerning this type have not been considered and must be exempt from putting in RID/ADR			Work going on with the aim to include over moulded cylinders in the legislation TC to consider CEN Consultant comments
	3.1.8	Note 1 to entry: also see ADR definition -->There is no such definition in RID/ADR			

Dispatch 1

prEN 1440	LPG equipment and accessories - Transportable refillable traditional welded and brazed steel Liquefied Petroleum Gas (LPG) cylinders - Periodic inspection		Where to refer in RID/ADR: 4.1.4.1P200 (11) and 6.2.4.2	Applicable sub-sections and paragraphs: P200 (8), (10) and (12) and 6.2.1.6 and 6.2.3.5	
WI 286154					
Assessment by CEN Consultant on 29.10.2014 (Dispatch 1)					
Summary of conclusions: <i>This draft is considered compliant with the text of RID/ADR 2015 in the sense of not- conflicting. Some amendments are suggested in the annexed template to be considered for further improvement. Given the fact that this assessment is submitted after the end of the enquiry these suggestions may be considered at the next revision of the standard.</i>					
Follow-up action by the Joint Meetings STD's WG: <i>This standard needs to be discussed by the STD's WG for reference in RID/ADR subsection 6.2.4.2, Table under "for periodic inspection and tests" and – in addition – in subsection 4.1.4.1, P200(11), Table, indicating (8), (10)v(2) and (12) as applicable requirements.</i>					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CCMC	Comment from WG Standards
UK	General	Agree the CEN Consultant's comments. This can go forward to the FV stage			
CH	general	Agree in general with CEN Consultant with some additions			
CH	1	Scope: There should be a reminder that in any case the requirements of RID/ADR take preference e.g. inspection interval, marking..	When there are contradictions between the standard and RID/ADR, the requirements of RID/ADR take	Indeed – general principle but better to avoid misleading the standard reader	Recommend including the proposed change in the Foreword.

			precedence over those of the standard.		
CH	2	Standards referenced in RID/ADR are dated	Put an information into the standard that only the in the regulation dated standards are applicable	Could easily be corrected before FV Comment from TC23: This has never been a requirement for normative references in standards	Only the standards referenced in RID/ADR are required to be dated.
CH	4	Table 1, line 3: 15 year interval in connection with brazed cylinders should not be mentioned, even if there is a reference to Annex B			This clause creates confusion for the user as it is not foreseen in the RID/ADR; CEN/TC 286 to consider.
CH	5.2.2.3	Test equipment: The interval of six month for checking the Pressure gauges is far to long. It should be kept as it was in the old standard (2008).	They shall be calibrated or checked for accuracy against a master gauge at regular intervals and not less frequently than once every month	TC 286: Not accepted: Experience has shown that the measurement errors after one month are not relevant. The calibration or check time can be extended with limited impact on the accuracy of the measurement.	Technical comment not related to compliance with RID/ADR.
CH	5.4/5.5	Valves shall be replaced according to their construction/lifetime. After periodic inspection a new or refurbished/inspected valve should be fitted. Similar to D4, second bullet point		TC 286: Not accepted: already required in 6.2	Accepted
CH	6.4	Their should be the standard information concerning the predominance of the regulation		TC 286 : When there are contradictions between the standard and RID/ADR, the requirements of RID/ADR take precedence over those of the standard	Accepted. Include a note explaining the need to follow the Marking Requirements of RID/ADR.
CH	Annex B	Insert a note as in appendix D	NOTE 2 The application of this Annex is subject to	TC 286: Agreed	Accepted

			the agreement by the competent authority.		
CH	Annex E	E2: Insert a reminder that the cylinder has to be cleaned before starting the inspection.	If required, the cylinder shall be cleaned and have all loose coatings or labels, corrosion products, tar, oil or other foreign matter removed from its external surface;	TC 286: Agreed	Accepted

Dispatch 1

prEN 16728	LPG equipment and accessories - Transportable refillable traditional LPG cylinders other than traditional welded and brazed steel cylinders - Periodic inspection	Where to refer in RID/ADR: 4.1.4.1P200(11) and 6.2.4.2	Applicable sub-sections and paragraphs: 6.2.1.6 and 6.2.3.5
WI 286156			

Assessment by CEN Consultant on 3.11.2014 (Dispatch 1)

Summary of conclusions:

This draft, except for Annex E is considered compliant with the text of RID/ADR 2015 in the sense of not- conflicting. Some amendments are suggested in the annexed template to be considered for further improvement.

Follow-up action by the Joint Meetings STD's WG:

This standard needs to be discussed by the STD's WG for reference in RID/ADR subsection 6.2.4.2, Table under "for periodic inspection and tests" and – in addition – in subsection 4.1.4.1, P200(11), Table.

Comments from members of the Joint Meeting:

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CCMC	Comment from WG Standards
UK	General	Agree the CEN Consultant's comments, except above summary– it is Annex F that is not compliant, as stated elsewhere in the assessment. This can go forward to the FV stage			OK but comments from the CEN Consultants need to be incorporated before FV
CH	General	Dispatched version is quit old and as well the Assessment by the CEN consultant. We therefore suggest to postpone the discussion on this standard until the new prEN is available, nevertheless we have some remarks in addition to the assessment.			Text to be reviewed at Formal Vote Stage.
	General	Overmolded cylinders are not yet accepted by			

		RID/ADR. We therefor do not comment parts concerning this type of cylinders.			
	Titel	“other than brazed and welded cylinders” should be deleted.	4/2014 - considering the need for consistent Terminology within the work program of the TC; decides to change the title of WI 00286156 From: LPG equipment and accessories - Transportable refillable LPG cylinders other than welded and brazed steel cylinders - Periodic inspection To: LPG equipment and accessories - Transportable refillable traditional LPG cylinders other than welded and brazed steel cylinders - Periodic inspection	TC 286: Not accepted: see decision 4/2014 of CEN/TC 286 :	Need to align the title with the scope and content. Annex A and Annex D deal with welded cylinders as do several clauses throughout the standard.
	2	Standards referenced in RID/ADR are dated	Put an information into the standard that only the in the regulation dated standards are applicable	Could easily be corrected before FV Comment from TC23: This has never been a requirement for normative references in standards	Only the standards referenced in RID/ADR are required to be dated.
	3.8	Here a period should be specified e.g. within a year otherwise the duration for manufacturing a batch could be endless		TC 286 This definition is deleted : production batch stated in Annex F but for this annex, the	OK

				definition over-moulded cylinder batch applies	
	4	The first sentence should be complemented as follows: The interval between periodic inspections shall be dependent on the content of a written scheme and , where applicable at least fulfil the requirement of RI/ADR.		TC 286: Not accepted: see the note added in the foreword.	to consider the content of the note.
	5.2.1	Second sentence should be amended: “The proof pressure test with gas requires ...”		TC 286: Partially accepted: "pneumatic proof test and leak test"	some improvement noticed.
	5.2.2.2 b)	Inspection, maintenance and scrapping of valves shall be in accordance with EN 14912 or an other equivalent standard referred to in RID/ADR. (see also 5.5)		TC 286: No longer relevant: sentence deleted to be in accordance with prEN 1440	OK
	5.2.2.4	The test pressure shall be at least the minimum test pressure defined in RID/ADR for the relevant product and the test pressure stamped as part of the operational marks.		TC 286 Already modified: (harmonised with in prEN 1440)	OK
	5.2.3	Add a new sentence: The requirements of 5.2.2.3 and 5.2.2.4 d) – i) are also applicable for the pneumatic proof test.		TC 286: Partially accepted: proposal for 5.2.2.4 not accepted because it is specific for hydraulic pressure test	The WG Standard considers that this applicable even if you carry the pressure test with gas – TC to consider to review.
	5.2.3.1. b)	Amend as proposed in 5.2.2.2b) (see also 5.5)		TC 286: See comment n°54 : sentence deleted	OK
	5.2.3.1.2.1	Amend as proposed in 5.2.2.2b) (see also 5.5)		TC 286: Partially accepted: proposal for 5.2.2.4 not accepted because it is specific for hydraulic pressure test	The WG Standard considers that this applicable even if you carry the pressure test with gas – TC to consider to review.
	5.3.2.2 c)	Amend as proposed in 5.2.2.2b) (see also 5.5)		TC 286: See comment n°54 : sentence deleted	OK

	5.5	In our opinion the information given in this clause are sufficient so that 5.2.2.2 b), 5.2.3.1 b), 5.3.1.2.1 b) and 5.3.2.2 c) could be deleted.		TC 286: Accepted	OK
	6.4	Amend as follows: After successful completion of the periodic inspection, each cylinder shall be legibly and durably marked in accordance with EN 14894 and the requirements of RID/ADR. Note: The marking of cylinders is regulated by RID/ADR which takes precedence over any clause in this European Standard. The European Directive on Transportable Pressure Equipment 2010/35/EU includes additional marking requirements		TC 286: Not accepted: a note is already added in the scope dealing with any precedence of RID/ADR.	Need to have a statement specific to marking.
	Annex A	Amend "General" as follows: If at the time of the periodic inspection and tests no rejection criteria in Table A.1 and A.2 are available, the values of the tables in EN 1440 have to be used.		TC 286: Rejected: for instance corrosion criteria level has to be different from EN 1440 Noted for further revision of the standard	Missing rejection n criteria, to be covered in a FV version.
	Annex C	Amend "General" as follows: If at the time of the periodic inspection and tests no rejection criteria in Table C.1 are available, all the defects described in Table C.1 will cause the rejection of the receptacle.		TC 286: Noted for further revision of the standard	Missing rejection n criteria, to be covered in a FV version.

Dispatch 3

prEN 14595 rev	Tanks for transport of dangerous goods - Service equipment for tanks - Pressure and vacuum breather device		Where to refer in RID/ADR:	Applicable sub-sections and paragraphs:	
WI 296084					
No assessment by CEN Consultant provided					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from	Comment from

				CCMC	WG Standards
UK	5.6	No mention is made of the need for the materials to be compatible with the dangerous goods as required by ADR 6.8.2.2.1	Add a Note drawing attention to the need for materials to be compatible with the dangerous goods.		Add a requirement similar to 'Materials shall be selected which are compatible with liquid petroleum products and other dangerous substances mentioned in the scope (Clause 1 of the standard)'
UK	General	Further comment deferred until the CEN Consultant's assessment is available			

B. Standards at Stage 3: Submitted for Formal vote

Dispatch 3

FprEN ISO/FDIS 17871		Gas cylinders - Quick opening valves - Specification and type testing (ISO/DIS 17871:2014)	Where to refer in RID/ADR	Applicable sub-sections and paragraphs:	
WI 023179					
No assessment by CEN Consultant provided.					
Enquiry draft not discussed by STD's WG					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CCMC	Comment from WG Standards
UK	General	No deviations from or contradictions with RID/ADR identified. The standard can be referenced subject to the CEN Consultant's positive assessment.			
CH		not to be mentioned in RID/ADR		TC23 reply: These valves are used for full pressure receptacles transported by road and rail and therefore should be in RID/ADR.	The Swiss delegate maintained that this standard could not be referenced in ADR/RID because quick opening valves are not mentioned

					in the regulation. The WG Standard did not support this viewpoint.
Decision of the STD's WG:	Accepted Refused Postponed	Comments DE EN ISO 17871: to be referenced in 6.2.4.1 under "closures", applicable for 6.2.3.1, 6.2.3.3 and 6.2.3.4 Submission to FV planned 26 th March 2015			

Dispatch 3

FprEN ISO 21029-2	Cryogenic vessels - Transportable vacuum insulated vessels of not more than 1 000 litres volume - Part 2: Operational requirements (ISO/DIS 21029-2:2014)		Where to refer in RID/ADR	Applicable sub-sections and paragraphs:	
WI 268061					
No assessment by CEN Consultant provided.					
Enquiry draft not discussed by STD's WG					
Comments from members of the Joint Meeting					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CCMC	Comment from WG Standards
UK 1	4.2.2	The Class Hazard label(s), UN Number and Proper Shipping Name required for transport are not mentioned.	Add these transport of dangerous goods requirements.		Need to be addressed.
UK 2	15	RID/ADR require that pressure relief valves are tested every five years – other checks are at 10 year intervals (See P203 (8)).	Revise this clause. 5 year testing is a requirement for UN pressure receptacles, so it is relevant to ISO too.		Need to be addressed.
UK 3	General	It is assumed that this will replace EN 1251-2:2000 which is referenced in 6.2.4.2. A CEN Consultant's positive assessment is needed.			

CH		General: not to be referenced in RID/ADR			WG standard agree not to reference this standard. Also the need to retain EN 1251-2 as a reference should be reviewed.
CH	4.2.2	Labelling has to be in accordance with the requirements of RID/ADR			Need to be addressed
CH	10	Hint to the degree of filling is missing ((P203/5)			Need to be addressed.
CH	15	Periodic Inspection: P203/8 periodic inspection of pressure relief valves shall not exceed 5 years			Contradiction to RID/ADR
Decision of the STD's WG:		Accepted Refused Postponed	Additional comments Formal Vote will close 22nd March 2015 To be referenced in the part 1 of the standard.		

Dispatch 3

FprEN 13953		LPG equipment and accessories - Pressure relief valves for transportable refillable cylinders for Liquefied Petroleum Gas (LPG)	Where to refer in ADR:	Applicable sub-sections and paragraphs:		
WI 286142						
Assessment by CEN Consultant on 31.12.2014 (Dispatch 2) Summary of conclusions: None of the normative references conflicts with the related ADR RID provisions. There is no reason to object to a reference to EN 13953 based on its normative references. The current version of EN 13953 is not referenced directly in ADR/RID but is included as a normative reference in a number of older standards which are themselves referenced directly in ADR/RID.						
Enquiry draft discussed by STD's WG in March 2013 with comments; supported for ref. in RID/ADR and in valve std's. (see INF.45)						
Comments from members of the Joint Meeting:						
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards	
UK 1	3.10, 3.11	These two definitions are identical, so one must be wrong			The standard can be used without correcting the	

					definitions.
UK 2	General	This standard can be referenced under ' <i>for closures</i> ' in 6.2.4.1.			
CH	General	Not to be referenced in RID/ADR			WG Standard considered that this should be a standard referenced in the Valve standards which are referenced but following information from the LPG industry that separate PRDs are fitted to forklift truck cylinders the reference was agreed.
WG Standard					Need to override the sentence : 'This European Standard does not exclude the use of other designs of pressure relief devices that provide a similar level of safety'. This has no meaning in a normative document and the reference in ADR/RID should include the following note: 'the final sentence of the scope shall not apply'.
Decision of the STD's WG:	Accepted Refused Postponed	Additional comments DE EN 13953: to be referenced in 6.2.4.1 under "closures", applicable for 6.2.3.1 and 6.2.3.4 Standard made already available in March 2015 by CCMC for publication			No transition regulation required.

Dispatch 2

FprEN 14912	LPG equipment and accessories - Inspection and	Where to refer in	Applicable sub-sections and paragraphs:
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WI 286144		maintenance of LPG cylinder valves at time of periodic inspection of cylinders		RID/ADR		
Assessment by CEN Consultant pending.						
FV draft (WI 286151) discussed by STD's WG in September 2013 with comments (see INF.22 rev).						
Comments from members of the Joint Meeting:						
Country	Clause No.	Comment (justification for change)		Proposed change	Comment from CCMC	Comment from WG Standards
UK 1	General	This standard should be referenced in RID/ADR 6.2.4.2 alongside EN ISO 22434:2006 <i>Transportable gas cylinders - Inspection and maintenance of cylinder valves</i> .				Agreed.
UK 2	Foreword	RID is not mentioned as was requested at the review of this standard at the enquiry stage. It should be added to ADR here and in the Bibliography				Agreed.
Decision of the STD's WG:		Accepted	Additional comments DE EN 14912: to be referenced in 6.2.4.1, replacing EN 14912:2005 Standard made already available in March 2015 by CCMC for publication			
		Refused				
		Postponed				

Dispatch 3

FprEN 15207:2014	Tanks for the transport of dangerous goods - Plug/socket connection and supply characteristics for service equipment in hazardous areas with 24 V nominal supply voltage		Where to refer in RID/ADR 9.2.2.6.3	Applicable sub-sections and paragraphs:	
WI 296064					
No assessment by CEN Consultant provided.					
Enquiry draft not discussed by STD's WG					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CCMC	Comment from WG Standards
UK	General	A non-expert in vehicle wiring makes these comments, but on my reading of Chapter 9.2, this standard does not contradict any technical requirement of ADR. There seems no reason to prevent this version of this standard being used either as an alternative to EN 15207:2006 or replacement with a transition measure in Chapter 1.6.		TC 296: EN 15207:2006 is referred in 9.2.2.6.3 for the electrical connectors between motor vehicles and trailers. This reference should be replaced by EN 15207:2014.	agree to replace EN15207:2006 with the 2014 version
CH	General	Not to be referenced in RID/ADR			
Decision of the STD's WG:		Accepted Refused Postponed	Additional comments 9.2.2.6.3 (General purpose std) for ADR ONLY Standard made already available in December 2014 by CCMC for publication		No transition regulation required

Dispatch 2

FprEN 13094	Tanks for the transport of dangerous goods - Metallic tanks with a working pressure not exceeding 0,5 bar - Design and construction		Where to refer in RID/ADR 6.8.2.6.1	Applicable sub-sections and paragraphs: 6.8.2.1	
WI 296066					
Assessed by CEN Consultant on 3.12.2014 (Dispatch 2)					
Summary of conclusions <i>There are no clauses in FprEN 13094 rev contradicting the provisions of RID/ADR subsection 6.8.2.1 declared as applicable in the existing references and can be approved.</i>					
Follow-up action by the Joint Meetings STD's WG <i>This standard needs to be discussed by the STD's WG as an addition to the existing references to EN 13094:2004 and EN 13094:2008+AC:2008 in RID/ADR 6.8.2.6.1, Table, under "For tanks" and related to subsections 6.8.2.1.</i>					

Enquiry draft discussed with comments by STD's WG in September 2013 (see INF.22 rev)						
Comments from members of the Joint Meeting:						
Country	Clause No.	Comment (justification for change)		Proposed change	Comment from CCMC	Comment from WG Standards
UK	1	This standard can be referenced, but the Scope needs to be clarified. Notes in standards cannot give requirements, so an editorial correction is required if fixed tanks on rail wagons are confirmed as excluded. Transition dates agreed.		Make text of note 2 normative or delete the note as appropriate.	TC 296 : No change from EN 13094:2008	UK comment withdrawn
Decision of the STD's WG:		Accepted Refused Postponed	Additional comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
			Standard will be made available on 1st April 2015 by CCMC for publication	EN 13094:2004	Between 1 January 2005 and 31 December 2009	
				EN 13094:2004 + AC:2008	Between 1 January 2010 and 31 December 2018	
				EN 13094 :2014	Until further notice	

Dispatch 2

FprEN 12972:2014	Tanks for transport of dangerous goods - Testing, inspection and marking of metallic tanks	Where to refer in RID/ADR 6.8.2.6.2	Applicable sub-sections and paragraphs: 6.8.2.4 and 6.8.3.4
WI 296067			
<p>First submission assessment by CEN Consultant on 20.7.2013.</p> <p>Summary of conclusions</p> <p><i>Major amendments are needed to align the standard with RID/ADR and to cover all regulations declared as applicable. A series of other deficiencies of editorial, technical and general nature have been detected and need to be addressed for the preparation of the FV text. Details are given in the Annex to this assessment.</i></p> <p>Follow-up action by the Joint Meetings STD's WG</p> <p><i>This standard needs to be discussed by the STD's WG as a replacement of the existing reference to EN 12972:2007 in RID/ADR 6.8.2.6.2 and related to subsections 6.8.2.4 and 6.8.3.4.</i></p>			
Enquiry draft discussed with comments by STD's WG in September 2012 (see INF.38)			
Comments from members of the Joint Meeting:			

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CCMC	Comment from WG Standards
CH	general	As there is a meeting of WG 5 in Berlin (13.03.2015) concerning the different views (including Doc ECE-TRANS-WP15-AC1-2015-15e UK) and the outstanding "additional proposals" by UK, we request to postpone the discussion on how to proceed with this reviewed standard until the September session. Nevertheless we would like to point to the possibility to make some restriction for the use in column 1 or 3 of the table in 6.8.2.6.1		It is proposed to postpone the discussions to the next RID/ADR session on this standard	Discussion postponed until next meeting
For UK comments see INF. 36					
Decision of the STD's WG:		Accepted Refused Postponed	Additional comments Standard made already available in February 2015 by CCMC for publication		No transition regulation required

C. Standards at Stage 4: Published standards

Dispatch 2

EN 16509:2014	Transportable gas cylinders - Non-refillable, small transportable, steel cylinders of capacities up to and including 120 ml containing compressed or liquefied gases (compact cylinders) - Design, construction, filling and testing	Where to refer in RID/ADR: 6.2.6.4	Applicable sub-sections and paragraphs: 6.2.6.1.5 and 6.2.6.3
WI 023165			
FV draft 2013-11-19 assessed by CEN Consultant on 13.1.2014, corr. 17.1.2014 (Dispatch 2)			
<i>Summary of conclusions</i> There are a few non-compliances with the preliminary text of RID/ADR 2015 which render the FV draft unacceptable for approval and an unrestricted reference in RID/ADR.			
<i>Follow-up action by the Joint Meetings STD's WG</i> This standard needs to be discussed by the STD's WG as an additional entry to RID/ADR 6.2.6.4			
FV draft discussed and postponed by STD's WG in March 2014 (see INF.20)			

Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CCMC	Comment from WG Standards
UK		The non-compliances detected by the CEN Consultant and the editorial suggestions have been resolved in the published version. Changes are shown below.	The standard can be referenced in 6.2.6.4 as a third indent.		
		Consultant's suggestion/observation	Content of published standard		
	4.2.2	Add working pressure to the design specification	Working pressure has no meaning for liquefied gases so it is better to use design pressure only. Design pressure is the pressure used in the proof pressure test.		OK
	4.5 5 th para.	Add 'The working pressure shall not exceed two thirds of the test pressure.'	This is the final sentence of this paragraph.		OK
	5.2.1	The Consultant observed: '... the hydraulic pressure test to be carried out on at least five receptacles, whereas the standard requires only one sample to be taken.'	Clause 6.2 requires that each of the tests of clause 5 be carried out on a minimum of 5 cylinders		OK
	5.8	The term "gross weight" isn't compliant with RID/ADR where "gross mass" is used.	Gross mass is used in this clause		OK
	7	The numbering of the reference to the opening force check doesn't fit. Replace by 5.9	The reference has been changed to 5.9		OK
CH	3.9	batch quantity of completed and pressure tested cylinder shells/ compact cylinders made consecutively by the same manufacturer using the same manufacturing techniques, to the same design, size and material specifications using the same heat treatment conditions (when applicable)	Consecutively has to be defined either by a number of pieces or by time otherwise a batch could be the production over a period of years or several millions of pieces	TC23 reply: This not a non-conformity with RID/ADR. The frequency of batch testing is determined in clause 7 so safety is not compromised if very large batches are specified. It would just make product recall more costly. ECMA: The term	Explanation accepted.

				<p>“batch” is only used in clause “7. Batch tests” and there it is clearly specified which number of pieces or time period have to be applied for the different tests. Consequently a change of the standard is not necessary.</p>	
CH	3	The definition of the inspector should be put into 3 not and not hidden in 4.1 (requirements/general)		<p>TC23 reply: This is not a definition; it is merely a statement of fact. ECMA: In other EN- or ISO standards this term is also not defined in the definition section. Consequently a change of the standard is not necessary.</p>	CH Proposal would be more user-friendly but not an issue of ADR/RID compliance. .
CH	5.4	Proof pressure test: The intention of this test is not clear. Shall it be a replacement of the hot water bath test? Then it should be mentioned as an alternative method → 5.7.3?		<p>TC23 reply: The leakproofness test is also required on every cylinder. The test in 5.4 is a hydraulic proof pressure test carried out with a gas on every cylinder – see Clause 9. ECMA: The hot water bath test is a combined test for both, leakage and test pressure. In 5.4 it is clearly said that the proof pressure test is not required if the hot water bath test is performed. If an alternative leakage test as described in 5.7.3</p>	Explanation accepted.

				is performed, the proof pressure test shall be performed according to 5.4 in addition. Consequently a change of the standard is not necessary.	
CH	5.7	<p>Alternative methods: RID/ADR 6.2.6.3.2. requires the approval by the competent authority and a special quality system for alternative methods.</p> <p>If you use the method describe in 5.7.3 will the whole production be stored for 14 days and than each cylinder weighted again an compared with its previous weight?</p>		<p>TC23 reply: Para. 1; Competent authority approval is covered by the note in 5.7.3. Para 2; Yes; this is what the method in this example requires. ECMA: The “NOTE” in 5.7.3 refers to this circumstance.</p> <p>The example below the NOTE of 5.7.3 shows only one method for establishing the leakage rate. Other methods are allowed too provided the Competent Authority agrees. Consequently a change of the standard is not necessary.</p>	Explanation accepted.
CH	7	<p>Batch test: the manufacturing process shall be subject to a survey by the Xa body an carry out tests required in 6.2.6</p> <p>These two requirements are missing in the standard</p>		<p>TC23 reply: The standard correctly identifies the tests to be done, but does not specify who does them because this is a matter of law not technology. CEN discourages the specification of who</p>	Xa (taken from 1.8.8 from ADR). Explanation accepted.

				carries out conformity assessment ECMA: This is subject of the regulation and need not to be specified in the standard. Consequently a change of the standard is not necessary.	
CH	9	The requirement for the marking does not fully correspond with the required markings mentioned in RID/ADR 1.8.8.4.1e : <i>Affix a durable and legible mark identifying the type of gas cartridge, the applicant and the date of production or batch number; where due to limited available space the mark cannot be fully applied to the body of the gas cartridge, he shall affix a durable tag with this information to the gas cartridge or place it together with a gas cartridge in an inner packaging.</i>	TC23 reply continued: The standard is written around type approval which requires conformity assessment according to 1.8.7, therefore 1.8.8 requirements do not apply. Also, since these articles contain less than 120 ml of Class 2.2 gas, they are only subject to the marking requirements of 3.4.	TC23 reply: all the required information is on the cylinder except when the volume is less than 10ml. when gas type and manufacturer only are shown. But all information is shown on the outer packaging. We do not understand the reference to an inner packaging since the cylinder is the inner packaging; maybe intermediate packaging is intended. ECMA: This standard is foreseen to cover only the provisions of Chapter 6.2. “REQUIREMENTS FOR THE CONSTRUCTION AND TESTING OF ...” and not of 1.8.8.4.1 Consequently a change of the standard is not necessary.	The reference will exclude clause 9 (Marking).

Decision of the STD's WG:	Accepted Refused Postponed	Additional comments- DE: EN 16509: to be referenced in 6.2.6.4 only ECMA propose the following addition to the end of 6.2.6.4: - for small receptacles containing gas (gas cartridges) containing non-toxic, non-flammable compressed or liquefied gases: EN16509:2014 Transportable gas cylinders – Non-refillable, small transportable, steel cylinders of capacities up to and including 120 ml containing.....	No transition regulation required
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Dispatch 3

EN 12252:2014		LPG Equipment and accessories – Equipping of LPG road tankers	Where to refer in RID/ADR 6.8.2.6.1	Applicable sub-sections and paragraphs: 6.8.3.2 and 6.8.3.4.9	
WI 286155					
No assessment by CEN Consultant provided					
Enquiry draft not discussed by STD's WG.					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CCMC	Comment from WG Standards
UK	General	Having checked the standard against the comments by the Standards WG and Consultant on previous versions of this standard, there seems no reason refuse this standard a reference in RID/ADR, subject to a final positive assessment by the CEN Consultant.			OK we need the standard and the previous version was referred in ADR
UK	Transition dates	The dates in Column 4 for the 2005 version shall be "Between 1 January 2009 and 31 December 2018". For this standard Column 4 shall be "Until further Notice".			OK
Decision of the STD's WG:		Accepted Refused Postponed	Additional comments		Standard transition dates apply

Dispatch 3

EN 16522:2014		Tanks for transport of dangerous goods - Service equipment for tanks - Flame arresters for breather devices		Where to refer in RID/ADR 6.8.2.6.1	Applicable sub-sections and paragraphs:
WI 296076					
No assessment by CEN Consultant provided					
Enquiry draft not discussed by STD's WG.					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CCMC	Comment from WG Standards
UK	General	The standard has responded to the comments made at its previous review in September 2013. It does not contradict ADR, but is so limited in content that it is questionable if it merits inclusion in the ADR. The Standards WG suggested incorporating the information in the ADR.	Another solution would be to add Table 1 to an Appendix in EN 16852:2010 and withdraw this standard.		
CH	General	At the time not ready for RID/ADR. We are in general of the meaning, that this standard should not necessarily be mentioned in RID/ADR			
Decision of the STD's WG:		Accepted Refused Postponed	Additional comments Ask the Tank WG for guidance		

Dispatch 3

EN 14432:2014		Tanks for the transport of dangerous goods - Tank equipment for the transport of liquid chemicals and liquefied gases - Product discharge and air inlet valves		Where to refer in RID/ADR 6.8.2.6.1	Applicable sub-sections and paragraphs: 6.8.2.2.1, 6.8.2.2.2 and 6.8.2.3.1.
WI 296069					
No assessment by CEN Consultant provided					
Enquiry draft discussed with comments by STD's WG in September 2013 (see INF.22 rev)					
Comments from members of the Joint Meeting:					

Country	Clause No.	Comment (justification for change)		Proposed change	Comment from CCMC	Comment from WG Standards
UK	General	Having checked the last comments from the Standards WG (Sept. 2013), there seems no reason refuse this standard a reference in RID/ADR, subject to a final assessment by the CEN Consultant.				References agreed
	Transition dates	Since we are dealing with references in the 2017 regulations, the final date for new type approvals should be 31 December 2018. The preceding version first appeared in RID/ADR 1 January 2009 Column 4 should read "Between 1 January 2009 and 31 December 2018. No need for a date in column 5.				Agreed
DE	General	Scope of the standards – Sometimes these standards are also used for tanks with a working pressure less than 50 kPa (voluntary). Is there a possibility to allow the application of these standards also for tanks with a working pressure less than 50 kPa regarding to the new head lines of the table in 6.8.2.6.1 RID/ADR 2017?				add a note 'may also be used for tanks with a working pressure below 0.5 bar' under the title
Decision of the STD's WG:		Accepted Refused Postponed	Additional comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
				EN 14432:2006	Between 1 January 2009 and 31 December 2018	
				EN 14432:2014	Until further notice	

EN 14433:2014		Tanks for the transport of dangerous goods - Tank equipment for the transport of liquid chemicals and liquefied gases - Foot valves		Where to refer in RID/ADR 6.8.2.6.1	Applicable sub-sections and paragraphs: 6.8.2.2.1, 6.8.2.2.2 and 6.8.2.3.1	
WI 296080						
No assessment by CEN Consultant provided.						
Enquiry draft discussed with comments by STD's WG in September 2013 (see INF.22 rev)						
Comments from members of the Joint Meeting:						
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CCMC	Comment from WG Standards	
UK	General	Having checked the last comments from the Standards WG (Sept. 2013), there seems no reason refuse this standard a reference in RID/ADR, subject to a final assessment by the CEN Consultant.			References agreed	
	Transition dates	Since we are dealing with references in the 2017 regulations, the final date for new type approvals should be 31 December 2018. The preceding version first appeared in RID/ADR 1 January 2009 Column 4 should read "Between 1 January 2009 and 31 December 2018. No need for a date in column 5.			Agreed	
DE	General	Scope of the standards – Sometimes these standards are also used for tanks with a working pressure less than 50 kPa (voluntary). Is there a possibility to allow the application of these standards also for tanks with a working pressure less than 50 kPa regarding to the new head lines of the table in 6.8.2.6.1 RID/ADR 2017?			add a note 'may also be used for tanks with a working pressure below 0.5 bar' under the title	
Decision of the STD's WG:		Accepted Refused Postponed	Additional comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
				EN 14433:2006	Between 1 January 2009 and 31 December 2018	
				EN 14433:2014	Until further notice	