Tanks: Informal Working Group on the inspection and certification of tanks

Transmitted by the Government of the United Kingdom

Summary

1. The informal working group on the inspection and certification of tanks met in London on 15 & 16 June 2015 under the chairmanship of Mr. J. Mairs (United Kingdom). Representatives of Belgium, France, Germany, the Netherlands, Poland, the Republic of Ireland, Switzerland, the United Kingdom, CLCCR, IDGCA, ITCO, and UIP participated. Finland, Spain and Sweden sent apologies for absence.

2. The group reviewed its mandate provided by the Joint Meeting and confirmed that it was sufficient for the work envisaged.

3. The group discussed the ultimate, ambitious and long term goal of mutual recognition for all inspection and certification activities within RID/ADR. More pragmatically, by identifying and establishing confidence building measures in the inspection and certification of RID/ADR tanks, the Group would be taking important steps along that path. However, until contracting parties had demonstrable confidence in their own systems for issuing certificates, they could not reasonably expect others to recognise them.

4. The group benefited from a presentation on the regulatory requirements applicable to appointed inspection and notified bodies in the Netherlands covering the hierarchy of governance, and the relationship between the competent authority and regulated bodies. The Chairman tabled a list of fundamental principles for exercising control over the activities of appointed inspection bodies operating beyond the borders of contracting parties. This list was derived from the lessons learned by the United Kingdom and its potential as a possible confidence building measure was noted by the Group.

5. The group was also given a presentation on another confidence building measure, namely a system for issuing certificates through a central database. Having been established in July 2014, the data collected was allowing the United Kingdom for the first time to obtain information on the numbers and types of certificates being issued by whom, when and where. This ability to monitor inspection body activity and its potential for assuring that this work is being done properly was also noted.

6. A participant from the United Kingdom tabled papers for initial consideration that sought to clarify inspection requirements. These papers contained draft proposals for:
i) Improving the requirements for maintaining and retaining tank records;

ii) Clarifying the requirements for the internal examination of tanks; and

iii) Guidance on the interpretation of the requirements of RID/ADR for exceptional checks after repairs and alterations to service equipment.

7. A participant from the United Kingdom also tabled a paper inviting the group to consider whether non-destructive test methods specified in 6.8.2.1.23 should extend beyond radiography and ultra-sound. The paper asks if the requirement in 6.8.2.1.23 appropriately specifies the locations for the testing of welds subject to high stresses and strains under impact or in-service conditions.

8. Finally, the group was presented with the preliminary results of ongoing research in the United Kingdom investigating the risk of rupture between the dish end and the tank barrel under rollover conditions. This work may lead to the Group being invited to consider improvements to the technical requirements for new designs of this joint.

9. The informal working group has scheduled to meet again in London from 12 to 14 October 2015 when it is proposed that it will:

i) Continue its discussions and where possible draw conclusions;

ii) Hear customer experience of issuing certificates through a central database;

iii) Review the returns from a questionnaire to be drawn-up and circulated to members of the informal working group in a pilot exercise that seeks to obtain information on what is known about the activities of appointed inspection bodies and the perceived merit of possible confidence building measures;

iv) Propose a set of principles that would boost confidence in the inspection and certification of tanks thereby promoting mutual recognition, including consideration of appointed inspection bodies being listed by the secretariats of UNECE and OTIF; and

v) Propose specific amendments to Chapters 1.8 and 6.8 for consideration by the Joint Meeting in March 2016.