

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

9 February 2018

Bern, 12–16 March 2018

Item 2 of the provisional agenda

Tanks

Report of the 7th informal working group on the inspection and certification of tanks

Transmitted by the Government of the United Kingdom

1. The informal working group on the inspection and certification of tanks met for a seventh time in London from 12-14 December 2017, under the chairmanship of Mr. J. Mairs (United Kingdom). Representatives of Austria, Belgium, Czech Republic, Finland, France, Germany, the Netherlands, Norway, Poland, Switzerland, the United Kingdom, International Union of Wagon Keepers (UIP), European Industrial Gases Association (EIGA), and the Private Wagon Federation (PWF Rail) of Great Britain participated. Apologies were received from the Republic of Ireland, the International Tank Container Organisation, the European Union Agency for Railways, and Frank Heming of BAM.

2. The Chairman noted the outcome of the Joint Meeting held in Geneva in September 2017 where it was acknowledged that the informal working group should aim to make proposals for amending the 2021 Editions of RID/ADR. Our report 2017/38 and associated information paper (Inf. 10) were both remitted to the Tanks Working Group but time did not allow for detailed scrutiny. It was further acknowledged that, in the absence of a complete set of proposals, there was scope for parts of our work, when considered in isolation, to be misunderstood. As a consequence, the Group decided to refrain from submitting further proposals to the Joint Meeting until a more complete set of proposals covering the relevant parts of sections 1.8.6, 1.8.7 and Chapter 6.8 are available. In taking this work forward, the Group is using ADR as the base document but fully recognises the need for it to incorporate the changes as applicable into the text of RID. It was agreed that the Joint Meeting was already appropriately sighted on the detail of our work to amend ADR and could be updated on progress by way of this report.

3. At the request of the Netherlands, the Group paused to reflect on whether we would ever be able to reach a conclusion and would our work improve affairs. Recalling the results of the questionnaire (see March 2017/Inf. 13) which showed there is no shared interpretation of the provisions for controlling the inspection and certification of tanks, the Group decided that it was right to persevere. The Chairman said that the UK was content to continue to host the Group while participants were willing to attend, subject to the consent of the Joint Meeting. However, the remit of the Group ought to be reviewed if and when our proposals for the 2021 Editions were accepted.

Appointment, control and monitoring of inspection bodies

4. The Group undertook a line by line review of the text presented in 2017/38 ending with agreement on proposals to amend section 1.8.7. Included within this work, the Group is adopting consistent terminology preferring “inspection body” to “relevant body” and

preferring «certificate of conformity» to «declaration of conformity». It is also aligning this work with the definition of “manufacturer” found in the Transport Pressure Equipment Directive so as to include any natural or legal person who has such equipment designed or manufactured and markets it under his name or trademark.

5. In doing so the Group was able to reach agreement on the procedures for the surveillance of in-house inspection services. Also, the group sought to clarify that the optional entry into service check only applied to tanks and not to other pressure receptacles. Thus our proposals remain consistent with the Transportable Pressure Equipment Directive.

6. In response to a query raised by Austria, the Group agreed that an individual could be appointed as an inspection body, so long as that individual met all of the pre-requisites of an inspection body. Austria noted that 6.8.2.4.6 of RID sets out the most important elements of an accredited body. (Note: A small group will meet to discuss these points in Prague on 5th and 6th March 2018 by special invitation of the Czech delegate in cooperation with the Netherlands).

7. Subject to the agreement of the Joint Meeting, the Group will meet again 2-4 May 2018 to review section 1.8.6 which will be progressed between sessions based on the proposed restructuring of this section made by France and the Netherlands. In the meanwhile the Netherlands shall organize a meeting with interested parties (France, Austria and Czech) to review section 1.8.6 and to draft text for amending and re-structuring RID/ADR 1.8.6.

Harmonisation of inspection procedures

8. The Group also undertook a line by line review of the proposed text for Chapter 6.8 (see Information Paper 10 to the Joint Meeting) and agreed a number of further amendments.

9. In undertaking this work, the representative of the UIP requested that we refocus on 6.8.2.1.23 (as proposed for the 2019 Editions). As a result, the group agreed the following for submission by the UIP to the spring 2018 meeting of the Joint Meeting:

*“The ability of the manufacturer, or the maintenance shop **in case of modification or repair**, to perform welding operations shall be verified **by the inspection body performing the relevant inspection**. A weld quality **control and assurance system** shall be operated by the manufacturer or the maintenance **shop performing modification or repair**.”*

Improvements to construction and inspection requirements

10. Germany informed the Group that the correspondence group on the construction of the bodies of EXII/EXIII vehicles had presented its work to WP.15 where it had been agreed to establish a working group which will meet in Bonn, 10-11 January 2018. It will investigate the hazards to which explosive substances and articles are exposed during carriage, determine appropriate measures to mitigate such hazards and clarify the questions raised during the 103rd session of the Working Party.

11. The Netherlands raised again their proposals for excluding the dual certification of Chapter 6.7 and 6.8 tanks. The Group will return to this topic advising that while it is theoretically possible for a tank design to meet the requirements of both chapters, at any given moment it may meet the requirements of one chapter but not the other depending on factors such as the load being carried, the degree of filling/fill ratio and the setting of an adjustable pressure relief valve. However, the Netherlands shall work together with France to draft a proposal for excluding the dual approval of Chapter 6.7 and 6.8 tanks and shall submit a paper to the Joint Meeting in a future session.

12. Poland gave notice that it would submit a paper to the Joint Meeting offering an opinion on the need to avoid different practices in applying the requirements of EN ISO 15614-1 to welding procedures. Poland believes that it would be advisable to clarify which level of welding procedure tests described in EN ISO 15614-1:2017 should be used.

13. The United Kingdom presented its paper on revising the information to be included on the tank plate to be submitted to the Joint Meeting. The UK took note of the feedback which provided useful insight into the matters that will need to be addressed before the proposal is acceptable.

14. The United Kingdom also gave an update to the Group on its proposals to waive the first annual inspections for qualifying FL and AT vehicles under 9.1.2.1. It reported that only two tank vehicles had failed their first anniversary test, but on road worthiness grounds only. More information will be presented in future sessions.

15. The United Kingdom gave notice of intent to prepare a paper to add a note to accompany the recent clarification on the use of austenitic-ferritic stainless steels (see INF.13 submitted by Germany at the Autumn session) to ensure that if ultrasound is used for non-destructive tests, the method is fit for purpose, taking account of these specific materials providing a high attenuation of ultrasonic waves.

Action requested of the Joint Meeting

16. The Joint Meeting is requested to give its consent to the work programme for the Group as outlined below.

Proposed further work for the informal working group on tank inspection and certification.

17. The informal working group intends to meet again on 2-4 May 2018 when it will, *inter alia*:

- (a) Consider the feedback from the Joint Meeting;
- (b) Review a proposed text by the Netherlands for amending and restructuring RID/ADR 1.8.6 that will be drafted between sessions;
- (c) Subject to sufficient progress having been made, the Group will prepare an document for the autumn 2018 session of the Joint Meeting containing a consolidated set of proposed amendments for the 2021 Editions of RID and ADR; and
- (d) Report further on the technical work aimed at improving the construction and inspection requirements for tanks.

18. Finally, the Chairman announced that he expected to retire in June 2018. Consequently, procedures to appoint a new Chair for the Group would commence in the New Year in time for the next meeting.
