Using the table in 6.8.2.6.1 referencing the standards for design and construction of tanks and for equipment

Transmitted by the Government of France

1. The table in RID/ADR 6.8.2.6.1 lists the standards which shall be applied for the issue of type approvals as indicated in column (4).

2. The use of this table doesn’t seem to be misleading concerning standards on design and construction of tanks or for the purpose of a separate type approval of equipment.

3. Difficulties may occur when standards on equipment are introduced in the table while a valid type approval doesn’t refer to these standards. In such a case, is it clear that the existing type approval needs to be at least updated or renewed?

4. For example, a type approval certificate was issued in 2015 for tanks intended for the carriage of LPG using EN 14025:2013. This certificate is valid until 2025. In RID/ADR 2017, EN 14432:2014 and EN 14433:2014 on equipment were introduced. The scope of these standards has been enlarged to include liquefied gases.

5. Looking at the dates given in column (4), these two standards shall be applied since 1 January 2019 according to the title of this column for a new type approval or a renewal of type approval for equipment with no doubt. But what’s about the example given in the paragraph above? Is it clear that since 1 January 2019 the type approval issued for LPG tanks needs to be updated to introduce a reference to these two standards?

6. France would like to know the opinion of the participants in the Working Group on Tanks on this subject and also if a clarification of RID/ADR should be proposed to avoid any misinterpretation.