

**ECONOMIC COMMISSION FOR EUROPE
INLAND TRANSPORT COMMITTEE**

Working Party on the Transport of Dangerous Goods

**Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods
(Geneva, 13-23 September 2005)**

Comments to documents INF.20 and INF.39

Transmitted by the AEGPL (Association Européenne des Gaz Liquéfiés)

Informal Papers have been issued by Competent Authorities with comments regarding LPG standards to be discussed at the Joint ADR/RID meeting in Geneva (13-23 September 2005).

The Members of the European LPG Association (AEGPL) have reviewed these comments and are in disagreement with a number of them. Detailed responses have been addressed to the relevant Competent Authorities.

The issue of most concern to the industry is the desire by some Competent Authorities to remove reference to these specific LPG standards and refer to generic gas receptacle standards.

We as an industry have already established our position as the largest sector of gas cylinders and tanks, outnumbering other gas receptacles by 10:1. We are also the only gases sector where the cylinders and tanks circulate freely within industrial, commercial and domestic market segments. These markets bring unique lifetime issues for LPG equipment. Our equipment must be light for handling by individuals but must be robust enough to stand a wide variety of handling methods. Because of the wide availability of LPG cylinders they may be handled and filled outside the ownership chain with the added dangers that this involves.

The European LPG Industry represents an activity delivering in excess of 30 million tons per annum providing clean and efficient energy to 100 million of consumers throughout Europe.

These LPG standards have been produced during the last 10/15 years by CEN Working Groups with the support of Authorities and Industry experts, including the equipment manufacturers, working together to harmonize the European LPG activity by selecting best standards and practices in use, in order to ensure safety, quality and efficiency.

The European standards production process is extremely robust, involving public comment resolution, including comments by national safety authorities, and final approval by stringent majority voting by the national standards bodies of all CEN countries.

The standardisation organisation and process can not lead to the production of unsafe and inadequate standards.

These standards represent current good practice in this industry. They incorporate the key technical features that have delivered a high level of safety. In many cases these standards have provisions which exceed the requirements of more generic pressure equipment standards and in other cases the fact that LPG is non-corrosive to steel has enabled an appropriate periodic inspection regime to be included. As the process of degassing and dismantling for inspection is much higher risk than the normal operation of the cylinder, once again the overall risk is reduced.

If the regulatory experts wish to ignore the expertise of the LPG industry and LPG equipment manufacturers by rejecting the standards specifically addressed at the industry's risks, they must develop an alternative means of addressing these risks. Many of the risks identified and managed in these LPG standards are not addressed in other more generic gases standards.
