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Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods
(Geneva, 19-29 September 2017)

Agenda item 5 b): Proposals for amendments to RID/ADR/ADN – New proposals

Specifying the conformity assessment of non-refillable pressure receptacles in 6.2.3.6.1 of RID/ADR/ADN

Submitted by Germany

Introduction

1. Under the table of the conformity assessment procedure in 6.2.3.6.1 it is stated:
For refillable pressure receptacles, the conformity assessment of valves and other demountable accessories having a direct safety function may be carried out separately from the receptacles and the conformity assessment procedure shall be at least as stringent as that undergone by the pressure receptacle to which they are fitted.
Originally, this sentence was supposed to make sure that a combined conformity assessment procedure for pressure receptacle shells and items of equipment is carried out for non-refillable pressure receptacles.
2. However, many manufacturers and Xa bodies interpret the sentence quoted under 1 to refer only to refillable pressure receptacles. Therefore, it is proposed to amend the text to make its applicability to non-refillable pressure receptacles clearer.
3. In standard EN ISO 11118:2015, which is now referred to in RID/ADR/ADN, the requirements for the inspection and testing of the cylinder shell (originally in ISO 11118:1999 and EN 12205:2001) and the valves (originally in EN ISO 13440:2001) were merged to facilitate a combined conformity assessment.

4. Since Directive 1999/36/EC was replaced by Directive 2010/35/EU, there have been no categories any more to which the phrase "*at least as stringent*" could refer. The last part of the sentence quoted under 1 is thus obsolete and should be deleted.

Proposal

5. It is proposed to amend the first sentence under the table in RID/ADR/ADN 6.2.3.6.1 as follows:

"For refillable pressure receptacles, the conformity assessment of valves and other demountable accessories having a direct safety function may be carried out separately from the receptacles and the conformity assessment procedure shall be at least as stringent as that undergone by the pressure receptacle to which they are fitted. For non-refillable pressure receptacles, the conformity assessment of valves and other demountable accessories having a direct safety function shall be carried out together with the assessment of the pressure receptacles."

Justification: Clarification of legal situation.
