

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

11 September 2018

Geneva, 17-21 September 2018

Item 5 (a) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:
pending issues**

Request to update ADR 2019 with missing standards

**Transmitted by the European Liquefied Petroleum Gas Association
(AEGPL)**

Summary

- Executive summary:** This is a request and justification for the inclusion for reference in ADR 2019 of two revised standards for the periodic inspection of LPG cylinders- EN 1440 and EN 16728 which had been published due to administrative reasons within CEN (together with other standards with the same problem - complete list in INF12), just 13 days after the due date (01/06/2018).
- Action to be taken:** Allow these two standards to be referenced.
- Reference documents :** ECE/TRANS/WP.15/AC1/150
ECE/TRANS/WP.15/AC1/18/BE/inf45
ECE/TRANS/WP.15/240
ECE-TRANS-WP15-AC1-2018-GE-INF12

1. The Joint Meeting adopted at its March 2018 meeting the proposals of the Working Group on Standards to add references to EN 1440:2016 + A1:2018 and EN 16728:2016 +A1:2018 to 6.2.4.2 of RID/ADR, provided that they are published before 1 June, 2018.
2. Likewise WP.15 of May 2018 and the permanent group of RID.
3. CEN TC 286 WG7 met the deadlines for the revision of these two standards, however for administrative reasons within CEN, publication was delayed until the 13 June 2018.
4. Consequently the RID/ADR amendments including reference to these 2 revised standards have been removed from the list of RID/ADR amendments notified for entry into force on 1 January 2019.
5. However, the amended main text of RID/ADR 2019 includes the changes that have been part of the revision of these two standards. As a result, if this request is not accepted, the main text of RID/ADR 2019 and the references will be contradictory.

6. This unfortunate situation is not without consequences for the competent authorities, control bodies, testing centres and distributors of LPG cylinders, and poses significant difficulties of application in line with the regulatory changes adopted over the last recent years.

7. In fact, with a view to their inclusion in RID/ADR 2019, these two amendments A1:2018 of EN 1440:2016 and EN 16728:2016 were initially developed by CEN TC 286 WG7 in 2017 and early 2018 in order to take into account comments from the CEN consultant, sent in the spring of 2016, which could not be taken into account in the 2016 versions due to the scheduling approval process for the then 2017 RID/ADR.

8. The lack of a CEN consultant had prevented his comments from being issued in time in the calendar of consultation and publication of the 2016 versions of these two standards with a view to their referencing in RID/ADR 2017.

9. For RID/ADR 2019, it was agreed with the Standards Working Group of the March 2016 Joint Meeting to launch the A1 Amendments in order to ensure that these comments were taken into account.

10. For these two standards for periodic inspection of LPG cylinders, some of the comments and modifications incorporated in these amendments are common to both standards.

11. More specifically, with regard to EN 16728:

(a) The recommendations of the joint meeting working group dedicated to alternative methods for the periodic inspection of cylinders (which worked in 2015, 2016 and 2017) was endorsed by the joint meeting of September 2017 in Geneva and so the requirements and provisions of the type of testing are included in RID/ADR 2019 ;

(b) Most of the detailed provisions for overmoulded cylinders were already contained in EN 16728:2016 in Chapter 3.5 and in Annexes F and G, but these were excluded from RID/ADR 2017 ;

(c) In addition, the amendment A1:2018 of EN 16728:2016 has been able to include the definition now agreed by the joint meeting for overmoulded cylinders.

12. The different users of RID/ADR will have difficulty understanding that these two standards for periodic controls of LPG cylinders developed in 2017, examined by the Standards Working Group, then adopted by the Joint Meeting in March 2018 and by WP.15 in May 2018, published before the summer of 2018, would be only mandatory in 2023 (i.e. 5 years later, following the usual procedure), whereas these amendments were adopted by the joint meeting and WP.15 in the first half of 2018 for entry into force as soon as the standards are published, which is now the case since 13 June 2018.

13. It is therefore proposed to adopt the reference to these two standards in the amendments of RID/ADR 2019 for entry into force on 1 January 2021 with a transitional period until 1 July 2021 only.

Draft amendments to RID/ADR adopted by the Joint Meeting and WP.15

« 6.2.4.2 In the table, delete the line "EN 1440:2008 + A1:2012 (except Annexes G and H)".

- For the standard "EN 1440:2016 (except Annex C)", in column 3), replace "Mandatory from 1 January 2019" with "Until 31 December 2020". After the standard "EN 1440:2016 (except Annex C)", add the following new line:

EN 1440:2016 +A1:2018 (except Annex C)	LPG equipment and accessories - Transportable refillable traditional welded and brazed steel Liquefied Petroleum Gas (LPG) cylinders - Periodic inspection	Mandatory from 1 January 2021
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- For the standard "EN 16728:2016 (except Article 3.5, Annex F and Annex G)", in column 3), replace "mandatory from 1 January 2019" with "until 31 December 2020". After the standard "EN 16728:2016 (except Article 3.5, Annex F and Annex G)", add the following new line:

EN 16728:2016 +A1:2018	LPG equipment and accessories - Transportable refillable LPG cylinders other than traditional welded and brazed steel cylinders - Periodic inspection	Mandatory from 1 January 2021
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