

## Economic Commission for Europe

### Inland Transport Committee

Working Party on the Transport of Dangerous Goods

9 September 2020

Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods

Bern, 10–11 September and Geneva, 14–18 September 2020

Item 2 of the provisional agenda:

Tanks

### **Report of the inter-sessional meeting of the members of the informal working group on the inspection and certification of tanks**

#### **Transmitted by the Government of the United Kingdom**

1. Following the cancellation of the spring session of the Joint Meeting in March 2020 due to the coronavirus pandemic the members of the informal working group on the inspection and certification of tanks met between sessions on a virtual platform on 10 and 11 June 2020 under the chairmanship of Mr. Steve Gillingham (United Kingdom). Representatives of Austria, Belgium, Finland, France, Germany, Ireland, the Netherlands, Norway, Poland, Romania, Spain, Sweden, Switzerland, the United Kingdom, the International Tank Container Organisation (ITCO), the International Union of Wagon Keepers (UIP), and the European Commission participated. Apologies were received from Turkey and the European Industrial Gases Association (EIGA).

2. The meeting opened with the Chair noting the outcome of the thirteenth meeting of the informal working group on the inspection and certification of tanks on 11 to 13 December 2019 reported in ECE/TRANS/WP.15/AC.1/2020/19, during which all the comments on the proposed amendments to Chapter 6.8 and to Sections 1.8.7 and 1.8.6, and to the related sections in Chapter 6.2 had been addressed other than for those on section 1.8.7. The remaining work of the group also included detailed consideration of the process for recognition of national systems equivalent to accreditation, as set out in the Annex to the report of the meeting, and of the concerns that had been expressed over the proposals for an entry into service verification for tank-vehicles to also apply to tank-containers and tank-wagons and to allow only type A bodies to undertake inspections.

3. The Chair also thanked Belgium, France, Germany, Ireland, the Netherlands, the United Kingdom and UIP for the documents submitted before the meeting to advance the discussions on the remaining aspects of the proposed amendments, and to be considered under any other business, namely the inspection of tanks after the deadline specified for the next inspection had expired and the interpretation of ADR in the context of a new approved type of LNG tank-container. Subject to the consent of the Joint Meeting, the Chair informed the group that a further meeting of the members of the group could be held in mid-December as on previous occasions if this was needed to address any further comments from the autumn session of the Joint Meeting in September 2020.

#### *Appointment, control and monitoring of inspection bodies*

4. In respect of the proposals for 1.8.6 on the administrative controls for the activities of inspection bodies, the group endorsed their support in principle for the process set out in the Annex of ECE/TRANS/WP.15/AC.1/2020/19 for the recognition of national systems equivalent to accreditation and noted that the views of the secretariats should be sought at the Joint Meeting before the process could be properly considered in detail. Due to time constraints and the significance of the concerns expressed, the proposals to allow only type A bodies to undertake inspections were also deferred to the Joint Meeting.

*Harmonisation of inspection procedures*

5. Using ECE/TRANS/WP.15/AC.1/2019/GE/INF.6 as a basis, the group reviewed and agreed the various comments on section 1.8.7 remaining from the meeting of the informal working group on 11 to 13 December 2019. This included comments on type examination at 1.8.7.2.1 and on the approval of modifications at 1.8.7.2.2.3. New comments from EIGA on 1.8.7.7.1 concerning the mark of the in-house inspection service were deferred as EIGA were not able to be present at the meeting.

6. Following discussion on adverse comments submitted in informal documents to the Joint Meeting in March on the proposal in 6.8.1.5 for a permissive entry into service verification for tank-wagons, the group supported a proposal to seek the views of the Joint Coordinating Group of Experts scheduled to meet before the Joint Meeting in September. Similar concerns were expressed also in an informal document to the Joint Meeting in March on the proposal elsewhere in 6.8.1.5 on the selection of inspection bodies for tank-containers. After discussion the group supported a proposal to replace the informal document submitted to the Joint Meeting in March with another that would contain revised proposals on the inspection bodies that should be permitted to undertake inspections of tank-containers, including when the owner or operator of the tank is not known at the time of inspection.

7. In respect of the consequential amendments foreseen for Chapter 6.2, the group reviewed and supported the comments on 6.2.2.11, 6.2.3.6.1, 6.2.3.8 and 6.2.3.9.3 in informal documents submitted to the Joint Meeting in March. Following discussion the group supported a proposal to replace the informal documents with another that would, amongst other things, clarify who would be responsible for the pressure receptacles undergoing approval and the nature of their relationship with the Type B inspection body.

*Any other business*

8. In anticipation of the discussion to take place during the next meeting of the working group on tanks, the members of the informal working group supported an informal document about the interpretation of ADR in the context of a new approved type of LNG tank-container and exchanged a wide range of preliminary views on the documents submitted to the Joint Meeting on matters concerning the inspection of tanks after the deadline specified for the next inspection had expired. Also, concerns were raised about the wording of 6.8.2.1.23 on welding and inspection of welds introduced in the 2019 edition of ADR and there was widespread support for a document to be put to the Joint Meeting for a further amendment to 6.8.2.1.23 to make it clear that non-destructive tests of welds other than those specified may be carried out using suitable testing methods other than radiography or ultrasound.

*Action requested of the Joint Meeting*

9. The Joint Meeting is invited to exchange any further views on the proposals for 1.8.6, 1.8.7 and the related sections in Chapter 6.8 combined in an informal document, and on the proposals for the related sections in Chapter 6.2 in a separate further informal document, and if necessary, to give its consent for the members of the informal working group and other interested parties to reconvene in due time to address the outcome(s) from the Joint Meeting and to submit final proposals in a working document by the deadline for the submission of working documents to the spring session of the Joint Meeting in March 2021. In particular, views are sought from the secretariats and the Joint Meeting on:

- (a) the process and 10-year transition for the recognition of national systems equivalent to accreditation set out in the Annex of ECE/TRANS/WP.15/AC.1/2020/19;
  - (b) the option of an entry into service verification for tank-wagons (and tank-containers) subject to the views of the Joint Coordinating Group of Experts; and
  - (c) whether Type C inspection bodies rather than Type A inspection bodies only should be permitted to undertake certain inspections.
-