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*,**

Introduction

1. The table in RID/ADR 6.8.2.6.1 contains the list of standards applicable for issuing type approvals, as indicated in column (4).
2. The use of this table does not appear to present any particular difficulties for tank design and construction standards, or in the case of separate type approvals for equipment.
3. However, some difficulties may arise where standards for equipment are introduced in the table when an existing tank type approval does not refer to such standards. In such a case, is it clear that such a type approval has to be updated or renewed?
4. For example, a type approval certificate was issued in 2015 for tanks intended for the carriage of LPG, using standard EN 14025:2013. The certificate in question is valid until 2025. Standards EN 14432:2014 and EN 14433:2014 on equipment were introduced into RID/ADR 2017. The scope of these standards has been expanded to include liquefied gases.
5. In view of the dates indicated in column (4), these two standards must be applied from 1 January 2019, according to the title of this column for a new type approval or for renewals of type approvals of equipment. But what about the example given in paragraph 4, above? Is it clear that since 1 January 2019, the type approval issued for LPG tanks has to be updated to include a reference to these two standards?

* In accordance with the draft programme of work of the Inland Transport Committee for 2018–2019, (ECE/TRANS/WP.15/237, annex V, (9.2)).
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Proposal

6. France would like to hear the opinion of the Working Group on Tanks on this matter and would like to know whether a clarification of RID/ADR should be proposed to avoid any misinterpretation.