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

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Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN: new proposals

Proposals for amendments to RID/ADR/ADN - Comments on ECE/TRANS/WP.15/AC.1/2020/9

Transmitted by the European Cylinder Makers Association (ECMA)* **

Introduction

1. Document ECE/TRANS/WP.15/AC.1/2020/9 submitted by the European Industrial Gases Association (EIGA) is a request to the Joint Meeting to extend the periodic inspection and test periods for battery-vehicles and multi-element gas containers (MEGCs), in P200, from 10 to 15 years.
2. High pressure seamless gas cylinders made from seamless aluminium alloy or steel are already allowed to be tested at intervals of up to 15 years under special provisions of the RID/ADR/ADN. There is a belief within the gas producers' industry that since this regime seems to have proven to be safe, a proposal can be made for extending the re-test period for battery-vehicles and MEGCs also to a period of 15 years.
3. ECMA is not in favour of such an extension in retest periods at this moment in time and would like to draw the attention of the Joint Meeting to several matters that should be considered before a decision is taken.

Aspects for consideration by the Joint Meeting

4. A review of the data relative to the 15-year re-test period applied on cylinders and bundles is needed, because at the time of the proposal of ECE/TRANS/WP.15/AC.1/2013/42 it was decided not to extend the work to cover the elements in battery-vehicles until experience had been gained with single cylinders and bundles of cylinders. Therefore, we

* 2020 (A/74/6 (Sect.20) and Supplementary, Subprogramme 2).

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propose to review only the rejection rates on cylinders and bundles used for UN 1046 and UN 1049.

5. The document submitted by EIGA should contain a convincing rationale for the extension of retest periods for cylinders/tubes used in battery-vehicles and MEGCs, to support their request.

6. EIGA's proposal states that "Battery-vehicles are subject to pre-fill inspections as prescribed in EN 13385":

- Note that standard EN 13385 is not referenced in RID/ADR;
- Further this standard was published in 2002 and since then there have been significant changes to the transport of bulk gases;
- It is therefore recommended that this standard be revised and submitted for inclusion in RID/ADR.

7. Periodic inspection and test standards have been developed for cylinders and bundles of cylinders. However, there are no such re-test standards for battery-vehicles and/or MEGCs. Such retest standards must be available for use before consideration is given to extending retest periods.

8. It is recommended that special checks and regular inspections are performed to ensure that the pressure receptacles installed on vehicles are not subject to external damage for example, impact or abrasion.

9. Further, pressure receptacles are continually stressed during transport caused by torsion of the chassis, vehicle braking, as well as other forces. Such forces can cause the loosening of cylinder/tube retaining devices e.g. straps. If cylinders/tubes move during such events it can lead to abrasion damage.

10. These occurrences require close attention and inspections. It is recommended that such information shall be recorded.

Recommendation

11. ECMA believe that it is premature for periodic inspection and test periods for battery-vehicles and MEGCs to be extended from 10 to 15 years

12. If it is decided to create an informal working group to discuss the provisions under which an extension of the retest period for battery vehicles and MEGCs from 10 to 15 years could be eventually accepted by the Joint Meeting, ECMA is interested in actively participating in this Working Group.
