

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

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Item 5 (b) of the provisional agenda

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

Clarification of the requirements for the application of standards in Chapter 6.2 and 6.8

Transmitted by the European Committee for Standardisation (CEN)

Introduction

1. Some members of the Joint Meeting's Working Group on Standards are concerned that parts of the explanatory text accompanying the tables of standards in Chapters 6.2 and 6.8 are not as clear as they need to be for general use. The text and tables in their current format were introduced in January 2011 and additional text has been inserted since then so there is also a need to present the ideas in a more logical order.
2. Since this paper concerns the clarification of text, the authors consider it is important that the proposals are presented in all official languages. The purpose of this informal paper is to determine if there is sufficient interest in these amendments to justify the preparation of an official paper for the next session of the Joint Meeting. The authors would welcome contributions from all participants in the Joint Meeting.
3. It has been reported that one inspection body has misunderstood its task when issuing a type approval. It had decided that the parts of the standard listed in 6.2.4.1 RID/ADR which are related to other parts of RID/ADR not listed in column (3) need not be checked for compliance when undertaking a type examination. In fact, this is the opposite of the intention of the regulation; following the standard ensures that not only the parts of the regulations listed in column (3) but also all other relevant requirements of the regulation are complied with. The inspection body shall check compliance with all relevant parts of the regulation, as well as with the complete standard.
4. It is probable that this misunderstanding arose from the heading of column (3) which reads "Applicable sub-sections and paragraphs". This does not give the right message if it is read in isolation; it begs the question, applicable to what? Different text is required to give a clearer indication that the standard complies with the listed RID/ADR requirements.
5. The key sentence in understanding this column is the second sentence in 6.2.4.1 which reads: "The standards referenced in the table shall be applied for the issue of type approvals as indicated in column (4) to meet the requirements of Chapter 6.2 referred to in column (3)." There are several ideas in this sentence and it would aid understanding if they were separated into discrete statements.
6. Another example of two important but unconnected ideas being expressed in one sentence occurs in third paragraph of 6.2.4.1 as follows: "If more than one standard is referenced for the application of the same requirements, only one of them shall be applied, but in full unless otherwise specified in the table below." It would surely aid understanding if this sentence was split into two. The second part of the sentence applies to all standards but the first part only applies to the special case where more than one standard could be applied.

7. Although this discussion concerns Chapter 6.2, the same words are used in Chapter 6.8 so amendment proposals will also be needed for the sub-sections concerned. The Working Group on Tanks may also wish to contribute their ideas for revising this text.

Proposals for Chapter 6.2

8. New text is shown underlined and deletions are ~~stuck through~~.

6.2.4.1 *Design, construction and initial inspection and test*

Since 1 January 2009 the use of the referenced standards has been mandatory. Exceptions are dealt with in 6.2.5.

Type approval certificates shall be issued in accordance with 1.8.7. ~~The standards referenced in the table below shall be applied for the issue of type approvals as indicated in column (4) to meet the requirements of Chapter 6.2 referred to in column (3).~~ For the issue of a type approval certificate, one standard applicable according to the indication in column (4) shall be chosen from the table below. If more than one standard may be applied, only one of them shall be chosen.

Column (3) shows the paragraphs of Chapter 6.2 to which the standard conforms. The standard shall be applied in accordance with 1.1.5.

Column (5) gives the latest date when existing type approvals shall be withdrawn according to 1.8.7.2.4; if no date is shown the type approval remains valid until it expires.

~~Since 1 January 2009 the use of the referenced standards has been mandatory. Exceptions are dealt with in 6.2.5.~~

Standards shall be applied in accordance with 1.1.5. They shall be applied in full, unless otherwise specified in the table below. ~~If more than one standard is referenced for the application of the same requirements, only one of them shall be applied, but in full unless otherwise specified in the table below.~~

The scope of application of each standard is defined in the scope clause of the standard unless otherwise specified in the Table below.

In Column (3) of the table replace the heading “Applicable sub-sections and paragraphs” by “Requirements the standard complies with”.

6.2.4.2 Replace the fourth paragraph beginning with “If more than one standard is ... table below” by “Standards shall be applied in full, unless otherwise specified in the table below. If more than one standard is referenced for the application of the same requirements, only one of them shall be applied.”

Proposals for Chapter 6.8

9. Proposals will be given in an official paper.
