

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

Bern, 15-19 March 2021

Item 2 of the provisional agenda

Tanks

12 March 2021

Comments on informal document INF.10

Transmitted by the Government of France

Introduction

1. France would like to thank the United Kingdom and the Working Group on the inspection and certification of tanks for the update of the proposed amendments to Chapter 6.8 and to Sections 1.8.7 and 1.8.6. We think that the structure of the proposal is correct as well as the principles contained in it.

2. However, we consider that some draft texts should be clarified or simplified to avoid difficulties of understanding and misinterpretation. To facilitate the discussion in the Working Group on Tanks we would like to offer the following comments or proposals.

Comments - proposals

3. Section 1.8.6 defines the approval of inspection bodies and the rules the inspection bodies shall fulfill. Section 1.8.7 defines the procedures to apply for the different activities. Chapters 6.2 and 6.8 defines the who does what. Keeping that in mind, some texts in 1.8.7 should be deleted avoiding incorrect references to inspection body or relevant body.

For example, in 1.8.7.1.2, "Each application for (...) shall be lodged by the manufacturer with a competent authority or an inspection body, as applicable, in conformity with Chapters 6.2 and 6.8." should be simplified to read "Each application for (...) shall be lodged by the manufacturer in conformity with Chapters 6.2 and 6.8."

4. Different wordings appear concerning inspection bodies: approved, recognized, designated, appointed (which in addition may be different according to the languages). The introduction of definitions, for example in a Note at the beginning of 1.8.6, could help understanding the different meanings taking into account the agreed principles which follow:

- An inspection body may be designated by the competent authority acting as the competent authority (see the definition of competent authority in 1.2);
- An approved inspection body is an inspection body approved by the competent authority to perform different activities;
- A recognized inspection body is an approved inspection body by a competent authority, recognized by another competent authority.

In 1.8.6.2.1, second paragraph, delete "approved" twice. "Alternatively" may be confusing in other languages.

In 1.8.6.2.4.3, replace the first sentence by the following "An approved inspection body by a competent authority may be recognized by another competent authority".

In 1.8.6.3.3 *NOTE*, replace "Appointed bodies" by "Type B inspection bodies".

5. The last paragraph in 6.8.1.5 is confusing.
- What does mean “the inspection body responsible for assessing the conformity”? It was not intended to require the same inspection body to perform type examination, supervision of manufacture and initial inspection.
- What does mean “complete tank”?
This paragraph amended should appear somewhere else.
6. In the last paragraph in 6.8.1.5.5,
- What does mean “the original certification”? Does it refer to the initial inspection?
- “if no such inspection body is available” may have different meanings and the wording should be improved.
7. In the new 6.8.2.3.2, under “*Type approval*”, delete “or the inspection body”.
In the fifth paragraph, add “and 6.8.3.6” after “6.8.2.6.1”. The last sentence “This separate type approval shall be taken into account when issuing the certificate for the tank, if the test results are presented and the service equipment is fit for the intended use.” is the current text. It should be placed in 1.8.7.2.1 (c), such verification is performed during the type examination of the tank.
8. An in-house inspection service is authorized by an inspection body (see 1.8.7.7.2 certificate of authorization).
In 1.8.7 *NOTE 1* and in 1.8.6.2.4.2 (d), replace “appointed” by “authorized”.
9. References to transitional measures in 1.8.6 and 6.8 should be deleted. Transitional measures are applicable anyway.
In 6.8.1.5, right hand column, delete « Notwithstanding 1.6.4.x these inspection bodies shall be accredited according to EN ISO/IEC 17020:2012 (except clause 8.1.3) Type A. »
In 1.8.6.3.1, last paragraph, delete « notwithstanding 1.6.4.x ».
10. In Annex IV, transitional measures, delete “6.2.2.11, 6.2.3.6 and” four times.
11. Consequential amendments, in 4.1.4.1, P200 (12) and (13) and in 1.8.8.1.1, for “IS bodies” delete “bodies” three times. In 1.8.8.1.1, replace “IS-body approved” by “IS authorized”.
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