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Item 5 (b) of the provisional agenda

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

Activities of in-house inspection services in accordance with RID/ADR 6.2.2.11 and 6.2.3.6.1

Transmitted by the Government of Germany^{*,}**

Summary

Executive summary:	The purpose of this proposal is to clarify for which pressure receptacles the procedures in accordance with RID/ADR 6.2.2.11 and 6.2.3.6.1 may be used by an in-house inspection service.
Action to be taken:	Clarification of RID/ADR 6.2.2.11 and 6.2.3.6.1 and insertion of a transitional measure in RID/ADR 1.6.2.

Introduction

1. According to RID/ADR 6.2.2.11 and 6.2.3.6.1, the periodic inspection of pressure receptacles may be carried out by an Xa or Xb inspection body or by an in-house inspection service (IS). While Xa and Xb inspection bodies must be accredited for their activities in accordance with EN ISO/IEC 17020:2012, the in-house inspection service IS is approved and supervised by an Xa inspection body. It does not require accreditation for its activities.

2. In practice, it has been found that in-house inspection services apply these procedures both to pressure receptacles owned by the applicant and to pressure receptacles not owned by the applicant.

* A/75/6 (Sect.20), para 20.51.

** Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2021/31.

3. When monitoring the manufacture and initial inspection, an in-house inspection service may only inspect pressure receptacles manufactured by the company to which the in-house inspection service belongs.
4. By analogy with paragraph 3, it is assumed that an in-house inspection service may only carry out periodic inspections on pressure receptacles owned by the company to which the in-house inspection service belongs. This view is also supported by the meaning of the term "in-house".
5. If periodic inspections are also to be carried out on pressure receptacles not owned by the company, accreditation as an Xb inspection body is required for this purpose (see also document ECE/TRANS/WP.15/AC.1/2021/16 of the informal working group on the inspection and certification of tanks).
6. Therefore, the following clarification is proposed.
7. If the clarification is adopted, an appropriate transitional period must be provided to protect the companies concerned from undue hardship.

Proposal

8. Amend RID/ADR 6.2.2.11 and 6.2.3.6.1 to read as follows (new text is underlined):
"IS means an in-house inspection service of the applicant under the surveillance of an inspection body conforming to 1.8.6.2, 1.8.6.4, 1.8.6.5 and 1.8.6.8 and accredited according to EN ISO/IEC 17020:2012 (except clause 8.1.3) type A. The in-house inspection service may only use the procedures described in the above table for pressure receptacles owned by the applicant, and shall be independent from design process, manufacturing operations, repair and maintenance."
9. Insert the following new transitional measure in RID/ADR 1.6.2 as follows:
"1.6.2.x Until 31 December 2024, in-house inspection services may carry out periodic inspections in accordance with the versions of 6.2.2.11 and 6.2.3.6.1 applicable until 31 December 2022 on pressure receptacles not owned by the applicant."

Justification

10. The purpose of this proposal is to clarify for which pressure receptacles the procedures in accordance with RID/ADR 6.2.2.11 and 6.2.3.6.1 may be used by an in-house inspection service and hence to establish a uniform procedure.
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