

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 2 of the provisional agenda

Tanks

Informal working group on the inspection and certification of tanks: Comments on document ECE/TRANS/WP.15/AC.1/2021/23/Rev.1

Transmitted by the Government of Germany

Germany supports the proposals of the informal working on the inspection and certification of tanks. The draft text as presented in document ECE/TRANS/WP.15/AC.1/2021/23/Rev.1 was reviewed with experts from the inspection services. As a result, a few amendments are proposed. New text is shown underlined and deletions are ~~struck through~~. The justification is given below each proposal.

Proposal for section 1.8.6

"1.8.6.3.3 *Delegation of inspection tasks*

- *NOTE: Type B inspection bodies ~~and in-house inspection services~~ are not allowed to delegate the activities for which they are approved ~~for authorized~~. In-house inspection services are only allowed to delegate the activities for which they are authorized by approval of the inspection body which has authorized them and to subcontractors which are accredited according to EN ISO/IEC 17025:2017 (except clause 8.1.3) or EN ISO/IEC 17020:2012 (except clause 8.1.3) as an independent and impartial testing laboratory or inspection body in order to perform testing tasks in accordance with its accreditation."*

Justification: Specific tests given in the standards to be mandatory applied for initial or periodic inspections might need to be subcontracted because they require a special test facility not available at the premises of the in-house inspection service and also of the inspection body. In such cases, based on approval of the inspection body, delegation should be allowed but the subcontractor shall proof his competency as well as independency and impartiality by accreditation.

Proposals for section 1.8.7

- "1.8.7.1.5 Type approval certificates, inspection certificates and reports for the products (pressure receptacles, tanks, elements ~~and~~, structural equipment, ~~and~~ service equipment ~~or~~; battery wagons/battery vehicles or MEGCs)"

Justification: List of products should be reviewed.

"1.8.7.2.2.2 (...)

The type approval shall be valid for a maximum of ten years. If within that period, the relevant technical requirements of RID/ADR, ~~including the referenced standards~~, have changed so that the approved type is no longer in conformity with them, then the type approval is no longer valid. If within that period, the withdrawal date according to column (3) of the tables in 6.2.2.1 ad 6.2.2.3 or column (5) of the tables in 6.2.4.1 and 6.8.2.6.1 or 6.8.3.6 applies,

the type approval is also no longer valid. It shall then be withdrawn by the competent authority or the inspection body which issued the type approval certificate.

NOTE: For the latest dates for withdrawal of existing type approvals, see column (5) of the tables in 6.2.4.1 and 6.8.2.6.1 or 6.8.3.6 as appropriate."

Justification: Current and proposed amended requirements for the validity of the type approval are in conflict with the current requirements given in the tables of 6.2.4.1, 6.8.2.6.1 and 6.8.3.6 and with the proposed amendments for the text above these tables, see informal document INF.13 of this session. With regard to the standards given in the tables, a type approval becomes only invalid before its given expiry date if the Joint Meeting agrees on introducing a latest date for withdrawal of existing type approvals in column (5) of the tables. Only changes of the main text of RID/ADR will result in withdrawing type approvals ahead of time. Otherwise, type approvals issued on the last day of the application of an old standard according to column (4) of the tables would become invalid immediately the next day or at end of the transition period of 6 months.

"1.8.7.7.2 (...)

The in-house inspection service shall not subcontract any part of the periodic inspections without the approval of the inspection body which has authorized it. The subcontractor shall be accredited according to standard EN ISO/IEC 17025:2017 (except clause 8.1.3) or EN ISO/IEC 17020:2012 (except clause 8.1.3) as an independent and impartial testing laboratory or inspection body in order to perform testing tasks in accordance with its accreditation."

Justification: Specific tests given in the standards to be mandatory applied for initial or periodic inspections might need to be subcontracted because they require a special test facility not available at the premises of the in-house inspection service and also of the inspection body. In such cases, based on approval of the inspection body, delegation should be allowed but the subcontractor has to proof his competence as well as independency and impartiality by accreditation.

or, as alternative:

~~"The in house inspection service shall not subcontract any part of the periodic inspections."~~

Justification: If already agreed for 1.8.6.3.3 (see proposal for 1.8.6 above), there is no need to repeat the requirement for subcontracting.

Proposals for Chapter 6.2

"6.2.2.12 *Equivalent procedures for conformity assessment and periodic inspection and test*

(...)

~~For refillable pressure receptacles, the conformity assessment of valves and other demountable accessories having a direct safety function may be carried out separately from that of the pressure receptacles. For separate conformity assessments (e.g. cylinder shell and closure) see 6.2.1.4.4."~~

Justification: 6.2.2.12 will be amended by harmonization with the UN Model Regulations, see ECE/TRANS/WP.15/AC.1/2021/24/Add.1. Germany intends to submit a proposal to the UN Sub-Committee of Experts on the Transport of Dangerous Goods to add the current additional sentence of 6.2.3.6.1 "For non-refillable pressure receptacles, the conformity assessment of valves and other demountable accessories having a direct safety function shall be carried out

together with the assessment of the pressure receptacles." to maintain the current clarification that separate conformity assessment is not allowed for non-refillable pressure receptacles, if further on needed.

"6.2.3.6.1 *Equivalent procedures for conformity assessment and periodic inspection and test*

(...)

~~For refillable pressure receptacles, the conformity assessment of valves and other demountable accessories having a direct safety function may be carried out separately from the pressure receptacles. For non-refillable pressure receptacles, the conformity assessment of valves and other demountable accessories having a direct safety function shall be carried out together with the assessment of the pressure receptacles. For separate conformity assessments (e.g. cylinder shell and closure) see 6.2.1.4.4."~~

Justification: 6.2.2.12 will be amended by harmonization with the UN Model Regulations, see ECE/TRANS/WP.15/AC.1/2021/24/Add.1. Germany intends to submit a proposal to the UN Sub-Committee of Experts on the Transport of Dangerous Goods to add the current additional sentence of 6.2.3.6.1 "For non-refillable pressure receptacles, the conformity assessment of valves and other demountable accessories having a direct safety function shall be carried out together with the assessment of the pressure receptacles." to maintain the current clarification that separate conformity assessment is not allowed for non-refillable pressure receptacles, if further on needed.

Proposals for Chapter 6.8

"6.8.2.3.2 *Type approval*

(...)

~~When the manufacturer of service equipment has carried out a separate type examination has been carried out [by the inspection body] and when the manufacturer requests it, the competent authority shall issue a certificate attesting that the type which has been examined meets the standard listed in the table in 6.8.2.6.1 or 6.8.3.6."~~

Justification: According to new 6.8.2.3.1, it is not the manufacturer but the inspection body, based on manufacturer's request, which carries out type examination. If needed "[by the inspection body]" can be added for clarification.