
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

Geneva, 21 September – 1 October 2021

17 September 2021

Item 5 (b) of the provisional agenda

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

Comments on activities of in-house inspection services in accordance with RID/ADR 6.2.2.11 and 6.2.3.6.1 – Document ECE/TRANS/WP.15/AC.1/2021/31

Transmitted by the European Industrial Gases Association (EIGA)

1. Document ECE/TRANS/WP.15/AC.1/2021/31, transmitted by the Government of Germany, proposes to limit the operation of in-house inspection services (IS) to periodic inspection of pressure receptacles owned and operated by the applicant.
 2. Current practice within the gases industry is to allow cylinders to be periodically inspected by an IS body under the control of a Type A body. A significant number of pressure receptacles owned by industrial and medical gases companies are periodically inspected by third party test centres specialized in such activities. Most independent test centres are IS bodies operating under the supervision of a Type A body.
 3. If the proposal in document ECE/TRANS/WP.15/AC.1/2021/31 were to be accepted the current periodic inspection regime would no longer be acceptable. The process for periodic inspection is well established and there no indication that this is an unsafe activity.
 4. Additionally, consideration must be given to customer owned pressure receptacles where the owner has no periodic inspection capability, therefore reliant upon the IS body to safely perform the recertification of the pressure receptacle. Removing the ability of an IS body to periodically inspect pressure receptacles will add an administrative burden for the additional accreditation with no benefits to enhance the safety of the activity.
 5. EIGA is not in favour of the proposal in ECE/TRANS/WP.15/AC.1/2021/31 as there is no added benefit to safety or otherwise.
-