



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, 14 March – 18 March 2022

Item 2 of the provisional agenda

Tanks**Comments on new 1.8.6.2.1, 6.8.1.5.3 (b) and 6.8.1.5.4 (b)
from ECE/TRANS/WP.15/AC.1/2021/23/Rev.1****Transmitted by the Government of the United Kingdom^{*}, ^{**}, ^{***}**

1. At the September 2021 session of the Joint Meeting, the United Kingdom expressed in informal document INF.42 concern about the absence of accreditation for an in-house inspection service when used by a manufacturer of service equipment for the supervision of manufacture in 6.8.1.5.3 (b) and for the initial inspection and tests in 6.8.1.5.4 (b).
2. Accreditation experts in the United Kingdom had noted that in the new 1.8.6.2.1 of ECE/TRANS/WP.15/AC.1/2021/23/Rev.1 inspection bodies are not required to be accredited for the authorization and surveillance of an in-house inspection service, and that this oversight should be addressed by an inspection body being accredited according to EN ISO/IEC 17065:2012 *Conformity assessment - Requirements for bodies certifying products, processes and services*.
3. Accordingly, at the inter-sessional meeting on 15 December 2021 of the members of the informal working group on the inspection and certification of tanks, the United Kingdom proposed that the new 1.8.6.2.1 in ECE/TRANS/WP.15/AC.1/2021/23/Rev.1 should be amended to require an inspection body, when approved by a competent authority, to be accredited according to EN ISO/IEC 17065:2012 where an in-house inspection service is used according to 6.8.1.5.3 (b) or 6.8.1.5.4 (b).
4. During the discussions in the informal working group it was said that such a proposal would be disproportionate and an unnecessary burden. It was noted that EN ISO 17020:2012 allows inspection bodies to use information supplied by any other party (such as an in-house inspection service) as part of the inspection process, provided the inspection body can verify the integrity of such information and the inspection body remains responsible for any determination of conformity.

^{*} A/76/6 (Sect.20), para. 20.76.

^{**} Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2022/17.

^{***} This document was scheduled for publication after the standard publication date owing to circumstances beyond the submitter's control.

5. However, it was also noted that the independence of inspection bodies could be compromised by no longer being independent of the parties involved, and that the authorization and surveillance of an in-house inspection service was outside the scope of accreditation according to EN ISO 17020:2012. It was then recognised, when considering *EA Document on Accreditation for Notification Purposes EA-2-17-M 2020* of the European co-operation for Accreditation, that in practice additional clauses in EN ISO/IEC 17021-1:2015 are to also be satisfied in addition to EN ISO 17020:2012, and also that the associated terminology used in the amendments proposed in ECE/TRANS/WP.15/AC.1/2021/23/Rev.1 and adopted at the September 2021 session were not sufficiently precise.

6. Accordingly, it was agreed that work should be done in the next biennium to improve the wording and take into account the relevant clauses in EN ISO/IEC 17021-1:2015 as per *EA Document on Accreditation for Notification Purposes EA-2-17-M 2020* of the European co-operation for Accreditation. As to whether the last sentence in 6.8.1.5.3 (b) and the last sentence in 6.8.1.5.4 (b) previously in [square brackets] should remain, or be removed until that work is complete, this was not discussed by the informal working group and so should be considered at the March 2022 session of the Joint Meeting before the 2023 editions of RID and ADR are finalised for publication.
