

## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

14 March 2022

#### Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Bern, 14 – 18 March 2022

Item 2 of the provisional agenda:

#### Tanks

### Summary report of the inter-sessional meeting of the members of the informal working group on the inspection and certification of tanks on 15 December 2021

#### Transmitted by the Government of the United Kingdom

1. Following the autumn session of the Joint Meeting in September 2021 the members of the informal working group on the inspection and certification of tanks (aka the London group) met between sessions on a virtual platform due to the coronavirus pandemic on 15 December under the chairmanship of Mr. Steve Gillingham (United Kingdom). Representatives of Austria, Belgium, Finland, France, Germany, Luxembourg, the Netherlands, Norway, Poland, Romania, Russia, Sweden, Switzerland, the United Kingdom, the European Commission, European Industrial Gases Association (EIGA), and the International Union of Wagon Keepers (UIP) participated.

2. The meeting opened with the Chair noting the outcome of the autumn session of the Joint Meeting, during which the proposals from the London group were adopted as corrected by the corrigendum and together with the modifications agreed in the working group on tanks and the Joint Meeting. However, it had been agreed that residual concerns surrounding the oversight of in-house inspection services would be discussed further during an inter-sessional meeting of the members of the London group chaired by the United Kingdom in December. This would provide an opportunity to also discuss further the transitional measures for type examinations and initial inspections of tanks introduced at the end of the autumn session.

3. With regard to the transitional measures for type examinations and initial inspections of tanks introduced in the notes to new 6.8.1.5, 6.8.1.5.1 (a) and 6.8.1.5.4 (a) at the end of the autumn session, some amendments to the notes of new 6.8.1.5.1 (a) and 6.8.1.5.4 (a) were proposed by the United Kingdom to clarify the position. However, during discussion it became clear that whilst the proposals would be consistent with the application in RID, they were not necessarily appropriate for ADR. In conclusion the United Kingdom agreed to consider other options to clarify the position and to submit an informal document to the March 2022 session of the Joint Meeting before the 2023 edition of ADR is published.

4. With regard to the oversight of in-house inspection services, it was recognised, when considering EA-2-17-M 2020 the European Accreditation *EA Document on Accreditation for Notification Purposes*, 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 term “supervision”, rather than say “inspection”, in ECE/TRANS/WP.15/AC.1/2021/23/Rev.1 as adopted at the September 2021 session was not sufficiently precise. Accordingly, it was agreed that work should be done in the next biennium to improve the wording in new 1.8.6.2.1 and take into account the relevant clauses in EN ISO/IEC 17021-1:2015 as per EA-2-17-M 2020 the European Accreditation *EA Document on Accreditation for Notification Purposes*. 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 reserved for the March 2022 session of the Joint Meeting before the 2023 edition of ADR is published. It was agreed that the United Kingdom would inform the Joint Meeting of the position so that consideration could be given as to the next steps that should be taken to address this issue.

5. During the meeting the opportunity was also taken to further discuss ECE/TRANS/WP.15/AC.1/2021/31 which seeks to clarify whether an in-house inspection service may only apply the procedures in 6.2.2.11 and 6.2.3.6.1 to pressure receptacles owned by the applicant or whether in addition an in-house inspection service may also apply the procedures to pressure receptacles not owned by the applicant. The majority of those who spoke agreed that whilst safety should not be compromised by an in-house inspection service using the said procedures for pressure receptacles not owned by the applicant, it would be appropriate nevertheless to make a distinction between periodic inspections and inspections performed before pressure receptacles enter into service, perhaps via guidance based on the experience of the NOBO group of the European Union and the European Accreditation Members for accreditation of Conformity Assessment Bodies for notification purposes, as well as the competent authorities of the contracting countries. It was agreed that members of the group would reflect upon the discussions ahead of the spring session of the Joint Meeting.

6. In addition, the opportunity was taken to discuss 1.8.7.2.3(e) / new 1.8.7.2.2.1(f) regarding the list of the relevant parts of the technical documentation annexed to the type approval certificate (see 1.8.7.7.1 / new 1.8.7.8.1) which inspection bodies have said is difficult to interpret. It was also noted, for example, that the technical data sheet for type approval in Annex B (normative) of EN 12972:2018 should also be considered. At the end of the discussion it was agreed that this subject should be further discussed at the March 2022 session of the Joint Meeting based on a proposal to be submitted by France.

7. Under any other business the UIP introduced a brief exchange of views on electronic documentation / digital signatures on inspection certificates that was supported by the group.

8. In conclusion, the Chair thanked the participants for the good work and the secretariat to the group for their invaluable support. Looking forward to the next steps, the Chair noted that the March 2022 session of the Joint Meeting would be invited to consider:

(a) a clarification to the notes of new 6.8.1.5.1 (a) and 6.8.1.5.4 (a) to avoid the risk of type examinations and initial inspections performed by an inspection body approved or recognised by the competent authority of a country of manufacture bound by the note to new 6.8.1.5 not being accepted by a country of registration also bound by the note to new 6.8.1.5,

(b) how best to take into account the relevant clauses in EN ISO/IEC 17021-1:2015 where an in-house inspection service is used according to 6.2.2.12, 6.2.3.6.1, 6.8.1.5.3 (b) or 6.8.1.5.4 (b) and, given the work needed, 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,

(c) proposals to recognise the technical data sheets required by referenced standards to accompany type approval certificates, and to ensure a consistent interpretation by inspection bodies of the technical documentation to be listed with the type approval certificate.

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