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**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 3 February 2023**

Bern, 20-24 March 2023

Item 5 (b) of the provisional agenda
**Proposals for amendments to RID/ADR/ADN: new proposals**

 Comments on document ECE/TRANS/WP.15/AC.1/2023/10 (Germany) on section 6.2.3 of RID/ADR ‑ Requirements to be met by pressure-activated pressure relief devices for non-UN pressure receptacles

 Transmitted by the European Industrial Gases Association (EIGA)

 Introduction

1. EIGA does not support the proposals in document ECE/TRANS/WP.15/AC.1/2023/10 for the following reasons.

 EIGA comments

 2. The fitting of a Pressure Relief Device (PRD) is only required by RID/ADR for UN pressure receptacles used for the carriage of UN No. 1013, Carbon Dioxide and UN No. 1070 Nitrous Oxide, see P200 (2). There is no requirement for other pressure receptacles or other gases to be fitted with PRDs.

3. EIGA members use bursting discs on a voluntary basis for some gases such as UN No. 1013, Carbon Dioxide pressure receptacles to protect them against overfilling.

4. Bursting disks used by EIGA members are set to different test pressures (e.g. at 190 bar, at a pressure less than 250 bar or at a pressure more than 250 bar) and the situation is safe, there are no reported incidents.

5. As document ECE/TRANS/WP.15/AC.1/2023/10 is not mandating the fitting of PRDs, it suggests that the current situation is safe because it is not requested to retrofit pressure receptacles already in use or to new pressure receptacles.

6. The reference in the German document to CGA S-1.1–2022 "Pressure Relief Device Standards - Part 1 - Cylinders for Compressed Gases", is not appropriate because it applies to the protection of cylinders in the case of fire (quick pressure increase) and not in the case of overfilling (slow pressure increase), where no minimum flow is required.

 EIGA conclusion

7. In conclusion, EIGA does not support document ECE/TRANS/WP.15/AC.1/2023/10; it does not further improve the safety of use of cylinders.