National procedures for determining the inspection intervals for pressure receptacles which make use of composite materials in accordance with packaging instruction P 200 (9)

Transmitted by the Government of Germany*, **

Summary

Explanatory summary: Germany requests information on the Member States’ various approaches to national procedures for determining the inspection intervals for pressure receptacles which make use of composite materials in accordance with packing instruction P 200 (9).

Decision to be taken: –

Related documents: –

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* A/78/6 (Sect. 20), table 20.5.
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I. Introduction

1. In RID/ADR 2013, the amendment to packing instruction P 200 (9) made the competent authority or the body that issued the type approvals responsible for determining the inspection interval for pressure receptacles that make use of composite materials. With a further amendment to packing instruction P 200 (9) in RID/ADR 2017, an interval of five years as standard and a maximum inspection interval of ten years, with unchanged responsibility, was defined.

2. The actions of the bodies authorised by the German competent authority to issue type approvals and determine the inspection intervals for pressure receptacles that make use of composite materials in accordance with packing instruction P 200 (9) are based on the specifications of the BAM dangerous goods regulation GGR 021¹ in conjunction with the inspection procedures in accordance with BAM-GGR 022². These contain technically well-founded requirements so that a type or only a population of the type with an operator can benefit from the economically significant simplification of a 10-year inspection period.

3. There are indications that practice has developed very differently in the individual Member States.

4. It is not known in which country which criteria must be met for a ten-year inspection interval and whether or when, by analogy with packing instruction P 200 (12) and (13), the usual five-year interval is reverted to.

5. If requirements diverge greatly, this has an impact on safety and also affects competitiveness in the context of the freedom to provide services. It must therefore be in the interests of the Joint Meeting to obtain an overview of the various requirement profiles and to achieve harmonisation as far as possible.

II. Proposal

6. Germany proposes to collect and collate information on the various approaches used by the Member States. To achieve this, all the Member States should be asked to provide the following information:

   (a) Is an inspection interval of more than five years authorised?

   (b) What are the technical requirements for such a longer interval?

   (c) Is an extended inspection interval granted until the end of service life or is the extended inspection interval linked to ongoing compliance with verifiable conditions?

7. The aim is to present and discuss the information gathered at the Joint Meeting in March 2025.

8. This proposal supports Sustainable Development Goal 8 “Decent work and economic growth”.

¹ ggr-021.pdf (bam.de).