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Item 2 of the provisional agenda

Tanks

Clarification of the provisions in 1.8.7.2.1.2 (d) and 1.8.7.3.2 (d) of RID/ADR

Transmitted by the Government of France*, **, ***

Summary

Executive summary: This document aims to clarify the requirements of 1.8.7.2.1.2 and 1.8.7.3.2 on the approval of the procedures for the permanent joining, the approval of the personnel undertaking the permanent joining and the approval of the personnel undertaking the non-destructive tests.

Action to be taken: Modify 1.8.7.2.1.2 (d) and 1.8.7.3.2 (d).

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

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Introduction

1. 1.8.7.2.1.2 of RID/ADR covers the type examination tasks performed by the inspection body.

1.8.7.2.1.2 (d) specifies:

“As applicable, approve the procedures for the permanent joining of parts or check that they have been previously approved, and verify that the staff undertaking the permanent joining of parts and the non-destructive tests are qualified or approved;

2. 1.8.7.3.2 covers the supervision of manufacture tasks performed by the relevant body.

1.8.7.3.2 (d) specifies:

“As applicable, verify that the personnel undertaking the permanent joining of parts and the non-destructive tests are qualified or approved;

3. Three different subjects are introduced in these two paragraphs:

- The approval of the procedures for the permanent joining;
- The approval of the personnel undertaking permanent joining;
- The approval of the personnel undertaking non-destructive test.

4. In addition, the text of 1.8.7.2.1.2 (d) does not clearly specify who is authorized to qualify or approve, and these tasks seem to be related to the type examination.

5. On the other hand, in 1.8.7.3.2 the competent body is not always an inspection body (it can be an inspection service (IS) or a type A inspection body) and only verifies the qualification or approval, but the manufacturer may change its personnel during the validity of a type, without changing the type.

6. In addition, in 6.8.2.1.23 on the inspection of tank welds, it was clarified that the qualification of welding processes shall comply with the requirements of 6.8.5 as applicable.

This being clarified, it is understood that only the inspection body in charge of the type examination can perform these tasks.

7. To clarify these requirements, it is proposed:

- To separate in 1.8.7.2.1.2 (d) the three subjects in three different sub-paragraphs;
- To separate in 1.8.7.3.2 (d) the two subjects in two different sub-paragraphs;
- To harmonize and simplify the wording between check, verify, qualify and approve;
- To specify which type of body is authorized to qualify or approve the above referenced processes and personnel;
- To identify at what stage of the type examination and the supervision of manufacture the above referenced tasks shall be performed, taking into account any change of personnel without changing or amending the type;
- To align the wording with the applicable standards referenced in RID/ADR and in these standards; and
- To take into account the fact that non-destructive tests can be performed by the manufacturer personnel or the inspection body personnel.

I. Proposals

8. Modify 1.8.7.2.1.2 (d) to read as follows:

“(d) As applicable:

- (i) Qualifies and approves the procedures for the permanent joining of parts or verifies that they have been previously qualified and approved as

specified in the applicable standards and the RID/ADR by an inspection body as defined in 1.8.6;

(ii) Verify that the personnel undertaking the permanent joining of parts is qualified and approved or verify that the personnel has been previously qualified and approved as specified in the applicable standards and the RID/ADR by an inspection body as defined in 1.8.6;

(iii) Verify that the personnel undertaking the non-destructive tests is qualified and approved or verifies that the personnel has been previously qualified and approved as specified in the applicable standards and the RID/ADR or, if nothing is specified by the applicable standard, by an inspection body as defined in 1.8.6.

NOTE: The qualification and approval specified in (ii) and (iii) can be done separately from the type examination during the supervision of manufacture, in order to allow a manufacturer to use other personnel than the one originally proposed for the prototype equipment or series.

9. Amend 1.8.7.3.2 (d) to read as follows:

“(d) As applicable:

(i) Verify that the personnel undertaking the permanent joining of parts is qualified and approved by an inspection body in charge of the type examination;

(ii) Verify that the personnel undertaking the non-destructive tests is qualified and approved as specified in the applicable standards and the RID/ADR or, if nothing is specified in the applicable standard, by an inspection body in charge of the type examination.”

II. Applicability

10. Reference to the inspection bodies as defined in 1.8.6 or in charge of the type examination does not create additional requirements to inspection bodies or the manufacturer and clarifies who and how these tasks have to be performed.

11. This proposal referring to manufacturing standards and RID/ADR requirements is large enough to cover all cases of equipment defined in Chapters 6.2 and 6.8.

12. The aim of this document is to clarify the application of 1.8.7.2.1.2 to 1.8.7.3.2 of RID/ADR. Ensuring a more systematic approach and a better rationale in RID/ADR helps to develop clearer legal texts and avoid different criteria among different RID Contracting States / Contracting Parties to ADR and inspection services, and thus helps to implement the United Nations Sustainable Development Goal number 16: *Peace, justice and strong institutions*.