**Economic Commission for Europe**

Inland Transport Committee

**Working Party on the Transport of Dangerous Goods 5 September 2024**

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

Geneva, 10–13 September 2024
Item 2 of the provisional agenda:
**Tanks**

 Response to document ECE/TRANS/WP.15/AC.1/2024/45

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

 Transmitted by the International Tank Container Association (ITCO)

 I. Introduction

1. Document ECE/TRANS/WP.15/AC.1/2024/45 seeks to clarify the actions required of an inspection body defined in 1.8.6 with regard to 1.8.7 Procedures for conformity assessment, type approval certificate issue and inspections, particularly in 1.8.7.2 Type examination and type approval certificate issue and 1.8.7.3 Supervision of manufacture.

The terms, “approve”, “check”, “verify” and “qualified or approved” are the focus of the document.

 II. Proposed change to 1.8.7.2.1.2 (d)

2. Currently 1.8.7.2.1.2 (d) states:

“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***.”

3. The new proposal is to split this requirement into the three activities with new “additional tasks” underlined 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***.”

4. The proposal is that the “Inspection Body”, defined in 1.8.6, is the organisation to be specified to ***qualify*** and approve Welding Procedure Qualifications and Welder Qualifications as well as ***qualify*** NDT Interpreters and Operators. However, the two relevant referenced standards for tanks (EN 14025 and EN 12972) show that it is the responsibility of the manufacturer to qualify welding procedures and welder qualifications as well as provide the qualification certificates of personnel who perform Non-destructive Testing (NDT) (EN 12972 Clause 5.2.1.1).

5. These processes require supervision and qualification by appointed and appropriately qualified personnel according to standards, but it is not necessary for the sole provider of these services to be the RID/ADR inspection body. It is wholly appropriate for the inspection body to examine and approve the qualifications provided by the manufacturer during type examination and type approval.

6. The proposed NOTE in paragraph 8 of document ECE/TRANS/WP.15/AC.1/2024/45 confuses processes in 1.8.7.2 Type examination and type approval certificate issue with 1.8.7.3 Supervision of manufacture and it is recommended that these are treated separately.

 III. Proposed amendment to 1.8.7.3.2 (d)

7. Currently 1.8.7.3.2 (d) states:

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

8. The new proposal is to split this requirement into the two activities with new “additional tasks” underlined 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***.”

9. As stated in paragraph 3 above, there is no requirement for inspection bodies according to 1.8.6 to be the sole organisation engaged in qualifying personnel engaged in permanent joining, or NDT. For example standard EN 14025 defers to EN 12972 and EN 13445-5. Standard EN 13445-5 states that non-destructive testing personnel shall be qualified and certified in accordance with EN ISO 9712. Standard EN ISO 9712 Level 3 qualified personnel are authorised to supervise and qualify Level 1 and Level 2 NDT personnel.

 IV. Conclusion

10. It is recommended that the tasks of “qualifying” procedures for the permanent joining of parts, persons undertaking permanent joining processes, and NDT personnel remains as specified by RID/ADR referenced standards rather than being restricted to the appointed inspection bodies defined in 1.8.6.