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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
Bern, 24-28 March 2025
Item 5 (a) of the provisional agenda
Proposals for amendments to RID/ADR/ADN:
Pending issues

Carriage of pressure receptacles that require to have their conformity assessment completed at a location different from the place of manufacture

Transmitted by the European Cylinder Makers Association (ECMA)*, **

I. Introduction

- 1. At the September 2024 session of the Joint Meeting, ECMA submitted official document ECE/TRANS/WP.15/AC.1/2024/35. The proposal was discussed, and ECMA agreed to submit a revised proposal for the next session.
- 2. The design of pressure receptacles is evolving with the development of the use of composite constructions. One particular type is a fully wrapped pressure receptacle with a non-load sharing liner and composite reinforcement on both the cylindrical portion and the dome ends. These are referred to as type 4 pressure receptacles.
- 3. These pressure receptacles are constructed to standards that are referenced into Chapter 6.2 of the RID/ADR.
- 4. Due to the nature of the construction of these pressure receptacles there are additional requirements that need to be applied when the pressure receptacles are carried. Some manufacturers require a minimum pressure be maintained during carriage that could be at least five bar and possibly up to 20 bar. The reason for this is to ensure that the liner of the pressure receptacle does not separate from the wrapping during carriage.
- 5. Not every manufacturer of type 4 pressure receptacles have all the facilities at the manufacturing site to carry out all the tests required for the conformity assessment. These tests could include for example burst testing and blunt impact tests. In such situations these

^{*} A/79/6 (Sect. 20), Table 20.6.

^{**} Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2025/16.

tests need to be carried out at a different location and requires that the pressure receptacle is carried with a gas pressure that prevents the liner from separating from the wrapping.

- 6. Whilst the pressure receptacle has not undergone all the tests for conformity assessment required by the standard, the pressure receptacle would have undergone, as a minimum for the supervision of manufacture, the requirements for material tests and a pressure test. Examples of the tests that may need to be carried out at a location different from the manufacturing site could include the burst test, pressure cycling test and blunt impact test.
- 7. As a consequence of paragraph 6 above, the pressure receptacle is considered to be safe to be carried with either UN 1002 AIR, COMPRESSED or UN 1066 NITROGEN, COMPRESSED provided that the pressure during carriage does not exceed 20 bar or 10% of the working pressure which ever is the lower figure, the closures are protected to prevent damage during carriage and that the pressure vessel is labelled.
- 8. The exemptions related to the carriage of gases (see 1.1.3.2 (c)) have a limit of 200 kPa (2 bar) and it is considered that to increase this would not be practical as it could exempt the carriage of many gases from the regulations.

II. Proposal

- 9. To be able to carry pressure receptacles that have not undergone all requirements for conformity assessment for the purpose of performing the conformity assessment a new special provision is proposed as follows:
- "xxx Pressure receptacles that have not undergone all the tests specified by one of the standards for type 4 composite cylinders or type 4 composite tubes listed in Chapter 6.2 may be carried with either UN 1002 AIR, COMPRESSED or UN 1066 NITROGEN, COMPRESSED with a pressure that shall be not more than the lower value of either 10% of the working pressure or 20 bar for the purpose of completing the tests required by the standard provided that the supervision of manufacture, the requirements for material tests and a pressure test at the prescribed test pressure of the design standard has been satisfactorily competed.

Closures of pressure receptacles shall be protected during carriage.

The transport document shall include the following statement:

"Carriage in accordance with special provision xxx"."

In Chapter 3.2, Table A for UN Numbers 1002 and 1066, insert "xxx" in column (6).

III. Justification

- 10. This special provision will permit the carriage of pressure receptacles that have not undergone all requirements required by a standard listed in Chapter 6.2 for conformity assessment whilst containing either UN 1002 AIR, COMPRESSED or UN 1066 NITROGEN, COMPRESSED for the purpose of carrying out the conformity assessments.
- 11. This proposal contributes to the following United Nations Sustainable Development Goals: 7 Affordable and clean energy, 9 Industry, innovation and infrastructure and 13 Climate action.

IV. Safety Implications

12. None foreseen as the pressure receptacles will have undergone a supervision of manufacturer and as well a pressure test, for the purpose of a single journey.