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Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the Working Party on the Transport of Dangerous Goods (Bern, 18-22 March 2002)

CHAPTER 6.2: REQUIREMENTS FOR RECEPTACLES OF CLASS 2 (ALIGNMENT WITH THE UNITED NATIONS MODEL REGULATIONS)

Transmitted by the Government of Switzerland*

The secretariat has received from the Central Office for International Carriage by Rail (OCTI) the proposal reproduced below.

The core document TRANS/WP.15/AC.1/2001/33 was adopted by the RID/ADR Joint Meeting in 2001 and approved with some minor amendments by the Working Party on the Transport of Dangerous Goods (WP.15) for ADR and by the RID Committee of Experts for RID.

At the thirty-eighth session of the RID Committee of Experts in Prague in November 2001 the representative of Switzerland submitted an informal document, since some points concerning the decisions are not clear and could lead to different interpretations of requirements. The Government of Switzerland accordingly requests the Joint Meeting to clarify the following points:

^{*} Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2002/4.

Ad 6.2.5 Requirements for UN certified pressure receptacles

(new section)

1. The introductory text states that "In addition to the general requirements of 6.2.1, UN certified pressure receptacles shall comply ...".

Does this mean that UN cylinders must be designed to comply with the requirements of 6.2.1.1 to 6.2.1.7, i.e. those relating to design and construction, materials, service equipment, approval, initial and periodic inspections and marking?

If this is the case, the introduction to section 6.2.5 is unnecessary. In the context of the approval procedure in particular, major and sometimes also contradictory differences exist between RID/ADR cylinders and UN cylinders.

2. In 6.2.1.4, the approval of pressure receptacles, according to the module selected, must be issued by a testing and certifying body (appointed by the competent authority of the country of approval).

UN pressure receptacles, however, must be approved by the competent authority itself. The following questions arise:

Who is the competent authority? The authority of the country of manufacture or the authority of the country of approval? Must it be the authority of a State member of COTIF/a Contracting Party to ADR?

3. Ad 6.2.5.6.2.7 Testing laboratory

Is this the manufacturer's laboratory or the laboratory designated by the inspection body? The definition of the laboratory should appear in section 1.2.1.

4. Ad 6.2.5.6.4.2

What is meant by "design type approval certificate"? Is it a certificate for the approved design?

5. Ad 6.2.5.6.4.3 (e)

In practice, a requirement of this nature is difficult to enforce. The recall of an approval already issued should, however, most certainly be reported.

6. Ad 6.2.5.6.4.6

The phrase "to the information" should be deleted and not replaced.
