

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

**INF.61**

(Genève, 13-16 September 2004)

**Joint Meeting Standards Working Group  
Report of the fifth meeting,  
Genève, 13 - 15 September 2005**

1. The Standards Working Group (WG) met outside the plenary sessions of the Joint Meeting under the chairmanship of Mr P.Wolfs. The WG was tasked by the Plenary Meeting to consider document INF.20 and INF.39. In view of the problems experienced with the transmission of documents from CEN to the delegates, the Plenary Meeting requested also the WG to review the process of adopting standards described in the document TRANS-WP15-AC1-90a3e.
2. The WG started by reviewing the cooperation agreement in TRANS-WP15-AC1-90a3e and proposes a revised version as Annex 1 to this report.
3. The WG continued by reviewing the comments included in INF. 39 and INF. 20 on the standards transmitted by CEN. CEN had sent 3 standards at stage 2 of the adoption process (Public Enquiry) and 21 standards at stage 3 (Formal Vote).
4. The comments and recommendations from the members of the WG on INF.39 and INF.20 are consolidated in the Annex 3 to this report.
5. The proposals to adopt the reference to standards that are at stage 3 (Formal vote) are summarised in Annex 2.
6. The comments on the standards that were not adopted as reference documents and the comments on the standards that are at Public Enquiry stage will be transmitted to the relevant Technical Committees of CEN.

\*\*\*\*\*

...

**Annex 1 to the report of the STD WG Sep. 2005**

**Proposed revision of the Procedure of Cooperation with the European Committee for Standardization (CEN) to ensure conformity of EN standards with RID/ADR/AND safety requirements for the purpose of incorporation by reference**

**Procedure**

**Standards Development**

**Step 1**

CEN will develop standards according to the CEN/CENELEC rules. The CEN consultant will advise the Joint Meeting of work in progress in CEN which will result in standards intended to be referenced in the RID/ADR/ADN. The delegations to the Joint Meeting from countries which are CEN members can contribute technical comments to their National Standardization Bodies during the CEN (6 months) enquiry period.

**Step 2**

Draft standards ready for the Enquiry stage **will be uploaded onto a CEN website accessible by password to the members of the Standards WG and to delegates of the Joint Meeting. The website will flag to members that have access every time a document is uploaded onto the website. The list of standards that will be presented at the Joint Meeting WG Standards meeting will be sent for information as a formal document by the CEN Consultant in due time.**

The members of the Standards Working Group will comment on the compliance of the standard with the RID/ADR and these comments will be sent to the CEN consultant to be added to his assessment of the standard. This consolidated assessment will be sent to the Standards Working Group and its Chairman will present it to the Joint Meeting for **information**.

**Step 3**

As soon as the standard is ready for the Formal Vote a copy **will be uploaded onto the CEN website** accompanied by the CEN consultant's pre-assessment which shows how the Joint Meeting comments have been taken into account. **The website will flag to members that have access every time a document is uploaded onto the website.**

Comments on the standard's compliance with the RID/ADR/ADN should be sent to the

CEN consultant. Those received within one month from the date of circulation of the document shall be evaluated by the CEN Consultant. If they are deemed valid, the launching of the CEN Formal Vote may be postponed until any problem revealed has been resolved. Comments received after one month has elapsed will not delay publication but any consequential changes in the standard will be processed by initiating a revision.

#### **Step 4**

The Joint Meeting will take the decision to refer to CEN standards based on delegates' study of the Formal Vote text and taking into consideration the recommendations of the CEN Consultant and the Joint Meeting Standards Working Group.

#### **Terms of Reference of the Joint Meeting Standards Working Group**

The Working Group is restricted to commenting on whether the standard complies with the requirements of the RID/ADR/ADN. Technical comments **will be transmitted to the relevant Technical Committees of CEN.**

- The Joint Meeting will request participants to nominate their experts, to assign them to the working group and nominate a Chairman;
- The CEN consultant will collaborate with the working group;
- Meetings of the working group on standards will be held at the same time as the Joint Meeting, but outside its working hours. Working group sessions will begin on the first day of the meeting and will end on the last day of the meeting. The Chairman will report to the Joint Meeting on the first day of the meeting. The evaluation of the standard, including any amendments, will be completed by the end of the meeting.
- The Joint Meeting will include on its agenda an item under which the Chairman of the working group will report to the Joint Meeting.

The procedure is shown in the attached chart. (unchanged, except that the INF.DOC in Step 2 is changed in DOC.) Annex 2.

**Proposals to amend ADR/RID**

**Proposal 1:** modify the existing references to standards when the amendments are published:

a) in the table of P200 (11) of ADR/RID

Existing Reference	New reference	Title of Document
EN 13365:2002	EN 13365:2002+A1:2005	unchanged

b) in the table of 6.2. 2 of ADR/RID

Existing Reference	New reference	Title of Document
EN 13322-1:2003	EN 13322-1:2003+A1:2005	unchanged
EN 14427:2004	EN 14427:2004+A1:2005	Unchanged; add <i>Note: In 5.2.9.2.1 and 5.2.9.3.1, both cylinders shall be subject to a burst test when they show damage equal to or worse than the rejection criteria.</i>
EN 1968:2002 (except Annex B)	EN 1968:2002+A1:2005 (except Annex B)	unchanged
EN 12863 :2002	EN 12863 :2002+A1:2005	unchanged
EN 849 :1996/A2 :2001	EN ISO 10297 :2005	unchanged

c) in the table of 6.8.2.6 of ADR/RID

Existing Reference	New reference	Title of Document
EN 13530-2:2002	EN 13530-2:2002+A1:2005	unchanged

**Proposal 2:** add the following new references to standards when they are published:

a) in 2.2.2.1.5 *Oxidising gases*: ....see ISO 10156:1996 and **ISO 10156-2:2005**

b) in the table of P200 (11)

Applicable requirements	Reference	Title of document
<b>(7) and (10) ta (b)</b> (see Note 1	<b>EN 1439: 2005</b> (Except 3.5 and	Transportable refillable welded and brazed steel Liquefied Petroleum Gas (LPG) cylinders - Procedure for

and 2)	Annex C)	checking before, during and after filling
<b>(7) and (10) ta (b) (see Note 2)</b>	<b>EN 14794:2005</b>	<b>Transportable refillable aluminium cylinders for liquefied petroleum gas (LPG) - Procedure for checking before, during and after filling</b>

**Note 1:** as a consequence, the reference to this standard in (10) ta (b) shall be deleted

**Note 2:** the applicable requirement for (10) ta is only applicable to ADR;

c) at the end of 6.1.4.8.8, add the following *Note: EN ISO 16103:2005 provides additional guidance on procedures to be followed in approving the use of recycled plastics material.*

d) in the table of 6.2. 2 of ADR/RID

Reference	Title of document	Applicable sub-sections and paragraphs
<b>for materials</b>		
EN ISO 11114-4:2005 (Except method C in 5.3)	Transportable gas cylinders – Compatibility of cylinder and valve materials with gas contents – Part 4: Test methods for selecting metallic materials resistant to hydrogen embrittlement	6.2.1.2

\*\*\*\*\*

**Annex 3 to the report of the WG**

**Standards Working Group of the Joint Meeting ADR/RID**  
5th meeting, 13-16 September 2005, Geneva

**Comments on standards submitted by CEN before the meeting**

**A. Standards at Stage 2: Submitted for Public Enquiry**

*Dispatch from CEN dated 13 January 2005*

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
PrEN 14638-1	Transportable gas cylinders – Refillable welded receptacles of a capacity not exceeding 150 litres – Part 1: Welded austenitic stainless steel cylinders made to a design justified by experimental methods	6.2.2	6.2.1.2 and 6.2.1.5

*Comments from members of the Joint Meeting:*

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	10	Has to be in accordance with RID/ADR	Remark in RID/ADR		
UK		The UK can find no limitation on the stress that the cylinder sees at the hydraulic test pressure. Earlier drafts of this standard limited this stress to 77% of yield at hydraulic test pressure. It is not clear to the UK why this requirement has been removed and how the cylinders will be protected in service against very modest damage that would not have been included in the fatigue testing.			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN1442:1998 rev 2005	Transportable refillable welded steel gas cylinders for liquefied petroleum gas (LPG) - Design and construction	6.2.2	6.2.1.2 and 6.2.15

*Comments from members of the Joint Meeting:*

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	Whole Standard	There is already a new standard for welded steel cylinders mentioned in RID/ADR (EN 13322-1:2003). This standard is therefore unnecessary and the present EN 1442:1998 could be removed!			
CH	Annex A	If you put the gas name „Butane“ somewhere in the ADR marking area, this may be confusing. If the test pressure of 15 bar is a problem for the owner then it should clearly be stated above or below the ADR/RID marking „FOR UN 101/1095 BUTANE ONLY“. But this marking shall not conflict with the required marks	See decision to EN1442:1198:prA” in INF. 32 Annex 2 (Sept. 2004)		

<b>CH</b>	<b>5.1.3</b>	<b>The calculation pressure shall at least be the test pressure as recommended in RID/ADR P200</b>			
<b>CH</b>	<b>9.8.5</b>	<b>Cylinders originally heat treated have to be heat treated again after weld repair</b>	<b>Technical comment for TC</b>	Technical comment for TC	
<b>CH</b>	<b>10</b>	<b>Marking has to be in accordance with RID/ADR</b>	<b>Remark: Exclude clause 10</b>	The reference to prEN 14894 is normative only when this std is referred in ADR/RID	
<b>UK</b>	7.7.1.2.	This does not limit the stress in the cylinder to 77% of yield at hydraulic test. The UK believes that at 90% of yield for general membrane stress at 65C will push parts of the cylinder, or areas with modest damage, well above yield on a regular basis leading to the possibilities of fatigue in the higher stressed areas.		The 77% are met in the calculation of the wall thickness in 5.2; this stress is only at the 15 years hydraulic testing;	
<b>UK</b>	5.6.4	The UK is not clear why there is no requirement to use thread gauges to check thread profiles.		Technical comment for TC	



Reference	Title of document		Where to refer in ADR/RID	Applicable sub-sections and paragraphs			
prEN ISO 23667	Packaging - Transport packaging for dangerous goods – Rigid plastics and plastics composite IBC's - Compatibility testing		Create a reference to standards similar to 6.2.2 in a new 4.1.3.9	4.1.1.19.1			
<i>Comments from members of the Joint Meeting:</i>							
Country	Clause No./	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment (Editorial/ Technical)	Comment (justification for change)	Proposed change	Comment from CEN Con- sultant	Comment from WG Stan- dards
CH	Annex C	Table C.1		As this table is part of RID/ADR and may be changed at some time it can only be, as stated, for information only	Remark: Table C.1 to be excluded in RID/ADR	Table C1 needs to be aligned with the table of 4.1.1.19.1 – see comments received from the secretariat; these comments apply equally to EN ISO 16101 sent by CEN on 22 Aug.05	The two standards should be merged, the comments of the secretariat reviewed and a proposal to refer to them in ADR/RID submitted to the JM

**B. Standards at Stage 3: Submitted for Final Voting**

**Dispatch from CEN dated 21 January 2005**

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 1968 A1	Periodic inspection and testing of seamless steel gas cylinders	Already referred to 6.2.2 (except Annex B)	6.2.1. 6

*Comments from members of the Joint Meeting:*

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH		--			
UK	3	Standards WG needs a discussion on section 3 of this standard and the periodicity of examination allowed, which can be up to twice the interval given in P200. This is also the case for other TC23 periodic examination standards. UK has ample evidence to show that incidents do occur with cylinders and their closures when the periods set out in P200 are exceeded.		text is in present version of STD, unchanged with amendment; amendments is 2 lines in the scope	

<b>Decision of the Standards Working Group:</b>	<input checked="" type="checkbox"/> <b>Accepted:</b> <input type="checkbox"/> <b>Refused:</b>	<b>Comments:</b>
	<input type="checkbox"/>	

Reference	Title of document		Where to refer in ADR/RID	Applicable sub-sections and paragraphs			
EN 13530-2/A1:2005	Cryogenic vessels – Large transportable vacuum insulated vessels - Part 2: Design, fabrication, inspection and testing.		Already referred to in 6.8.2.6	6.8.2.1 (with the exception of 6.8.2.1.17), 6.8.2.4, 6.8.3.1 and 6.8.3.4			
<i>Comments from members of the Joint Meeting:</i>							
Country	Clause No./	Paragraph/Figure/Table/Note (e.g. Table 1)	Type of comment (Editorial/Technical)	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH				–		This amendment concerns the technical requirements to design the stiffening rings	
Decision of the Standards Working Group:				Accepted: <input checked="" type="checkbox"/> Re-fused: <input type="checkbox"/>	Comments:		

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN ISO 7866	Gas cylinders - Refillable seamless aluminium alloy gas cylinders – Design, construction and testing	6.2..2 in replacement of EN 1975	6.2.1.1 and 6.2.1.5

Reference		Title of document				Where to refer in ADR/RID	Applicable sub-sections and paragraphs
<i>Comments from members of the Joint Meeting:</i>							
Country	Clause No./	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment (Editorial/ Technical)	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH				--		Removed from the CEN list because European Annex makes it incompatible with ISO main document	
<b>Decision of the Standards Working Group:</b>				Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>		Comments: removed as EN ISO document	

*Dispatch from CEN dated 7 March 2005*

Reference	Title of document		Where to refer in ADR/RID	Applicable sub-sections and paragraphs			
EN ISO 16103: 2005	Packaging - Transport packaging for dangerous goods – Recycled plastics compatibility material		Create a reference to standards similar to 6.2.2 in a new 6.1.7	6.1.4.8.8			
<i>Comments from members of the Joint Meeting:</i>							
Country	Clause No./	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment (Editorial/ Technical)	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH/UK				--			
CEN						the text of 6.1.4.8.8 of ADR/RID is in the Definition of Recycled materials in the UNRTDG; standard; a proposal from Pira to refer to EN ISO 16103 as a note	Make a reference at the end of 4.1.4.8.8
Decision of the Standards Working Group:				Accepted: <input checked="" type="checkbox"/> Refused: <input type="checkbox"/>	Comments:		

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 1439 rev	Transportable refillable welded and brazed steel Liquefied Petroleum Gas (LPG) cylinders - Procedure for checking before, during and after filling	Already referred to in P200 (10) ta	NA

*Comments from members of the Joint Meeting:*

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	3.5 Only the version 2004-10 was available, the actual version is 2005-05!!	Protected cylinders are not cylinders in accordance with RID/ADR, this type of cylinders has already been discussed in the joint meeting and has been rejected.	Remark in RID/ADR where the Standard is placed	This is a definition; where does ADR/RID forbid to protect cylinder; to be confirmed;	
UK	4.1 3rd paragraph also Annex C and all references to Annex C	this text should be excluded from RID/ADR, as these cylinder types are not approved.		See above	
UK	4.2 (e)	this statement has no scientific grounding. The whole of the external surface of the cylinder must be inspected.		The list of defects are "e.g." and not exhaustive – see table 1; agree it could be clearer	

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	5th paragraph	Does not agree this is safe practice and should not be included in the standard. Valve removal should be done with in the periodic inspection			
UK	6.3	the standard does not give sufficient detail to ensure that cylinders are not overfilled.		<b>This existing clause is about checking the filling equipment and scales;</b>	
UK	7.2	As soon as reasonably practicable is not definite enough in a standard. Overfill can quickly lead to overstress and burst. The degree of overfill will determine how quickly the filler must react and the UK believes that this should be reflected in the text.		<b>Technical comment; the ADR/RID requirement not to offer for transport overfilled receptacles is covered</b>	
CH	Annex A	<b>It is not visible which area shall be used for RID/ADR cylinders</b>	<b>Remark: for RID/ADR only Area I is applicable</b>	<b>Conditions for Area 1 are the conditions of P200 (5) (c); agree, could add "ADR" after Area 1</b>	
Decision of the Standards Working Group:		<b>Accepted: X</b>	Refused: <input type="checkbox"/>	Comments: accepted provided that: 1) the reference	

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
				to protected cylinders are excluded in the reference; 2) “(ADR/RID/ADN)” is added next to Area 1 in Table A1	

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
EN 12863:2002/prA1	Transportable gas cylinders - Periodic inspection and maintenance of dissolved acetylene cylinders.	Already referred to in 6.2.2	6.2.1.6

*Comments from members of the Joint Meeting:*

Country	Clause No./	Paragraph/Figure/Table/Note (e.g. Table 1)	Type of comment (Editorial/ Technical)	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH				--		This amendment adds new criteria to inspect the mass of acetylene cylinders.	

<b>Decision of the Standards Working Group:</b>	<b>Accepted: <input checked="" type="checkbox"/></b> <b>Refused: <input type="checkbox"/></b>	<b>Comments:</b>
---	--	------------------



Reference	Title of document				Where to refer in ADR/RID	Applicable sub-sections and paragraphs	
EN13365:2002/A1:2005	Transportable gas cylinder - Cylinder bundles for permanent and liquefied gases (excluding acetylene) - Inspection at time of filling				Already referred to in P200 (11)	P200 (7)	
<i>Comments from members of the Joint Meeting:</i>							
Country	Clause No./	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment (Editorial/ Technical)	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH				--		Small amendment to add requirements where individual cylinders are fitted with valves	
Decision of the Standards Working Group:				Accepted: <input checked="" type="checkbox"/>	Refused: <input type="checkbox"/>	Comments:	

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14763	Transportable refillable composite cylinders for liquefied petroleum gas (LPG) - Procedure for checking before, during and after filling	P200 (11)	P200 (10) ta and (7)

*Comments from members of the Joint Meeting:*

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	General remark to standards concerning tests on LPG cylinders:	As long as there are no tests carried out, every cylinder with a defect has to be rejected and scrapped. It can not be the job of a filling station or a testing body to arrange these tests.	These standards are therefore not suitable for the inspection and test personell!  Standards affected: prEN 14763, prEN 14767, prEN 14913, prEN 14914		
CH	3.14	For periodic inspection the type approval and the standard used for type approval have to be considered not prEN 14427 in general	Remark: 3.14 not to use in RID/ADR	3.14 Removed from 2004/2005 version	
CH	4.2 b)	A relief valve is not mandatory for all type of cylinders (see also 4.4 c))	Remark: Exclude this point from RID/ADR	??? 4.4 c) .. pressure relief device (if fitted)	
UK	4.4 (b)	The UK considers that the text should make it clearer that all external surfaces of the cylinder must be inspected.		See comment for prEN 1439rev	

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	6.3	The UK does not believe that the text gives sufficient detail to ensure that cylinders are not overfilled.		See comment for prEN 1439rev	
UK	7.2	As soon as reasonably practicable is not definite enough in a standard. Overfill can quickly lead to over-stress and burst. The degree of overfill will determine how quickly the filler must react and the UK believes that this should be reflected in the text.		See comment for prEN 1439rev	
CH	Annex A Table A.1	It is not visible which area shall be used for RID/ADR cylinders	Remark: for RID/ADR only Area I is applicable	See comment for prEN 1439rev	

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	Annex A	The UK considers that Annex A should deal with the dangers of static discharge at time of fill from fully composite cylinders. The UK notes that 6.2.1 of ADR deals with 'use' and that the filling of a cylinder is covered by the definition of 'use'.		The standard is about checking the cylinder before, during and after filling to ensure the cylinder can safely be transported	
Decision of the Standards Working Group:		Accepted: <input type="checkbox"/>	Refused: <input type="checkbox"/>	Comments: <b>Not discussed</b>	

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14794	Transportable refillable aluminium cylinders for liquefied petroleum gas (LPG) - Procedure for checking before, during and after filling	P200 (11)	P200 (10) ta and (7)

*Comments from members of the Joint Meeting:*

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
---------	-------------	------------------------------------	-----------------	-----------------------------	---------------------------

CH	Annex A Table A.1	It is not visible which area shall be used for RID/ADR cylinders	Remark: for RID/ADR only Area I is applicable	See comment for prEN 1439rev	
CH	3.3	For periodic inspection the type approval and the standard used for type approval have to be considered not prEN 14427 in general	Remark: 3.3 not to use in RID/ADR	???	
UK	4.4	The UK considers that it must be clearer in the text that the full external surface of each cylinder must be inspected.		See comment for prEN 1439rev	
UK	5 para 4	The UK does not agree that this is safe practice and it should not be included in this standard. The UK considers that valve removal should be dealt with in the periodic examination standard.			
UK	6.3	The UK does not consider that the standard gives sufficient detail to ensure that cylinders are not overfilled.			
UK	7.2	As soon as reasonably practicable is not definite enough in a standard. Overfill can quickly lead to overstress and burst. The degree of overfill will determine how quickly the filler must react and the UK believes that this should be reflected in the text.			
<b>Decision of the Standards Working Group:</b>		<b>Accepted: X</b> Refused: <input type="checkbox"/>	<b>Comments: Comments: accepted provided that “(ADR/RID/ADN)” is added next to Area 1 in Table A1</b>		

*Dispatch from CEN dated 11 April 2005*

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14767	Transportable refillable composite cylinders for liquefied petroleum gas (LPG) - Periodic requalification	6.2.2	6.2.1.6

*Comments from members of the Joint Meeting:*

<b>Country</b>	<b>Clause No./</b>	<b>Comment (justification for change)</b>	<b>Proposed change</b>	<b>Comment from CEN Con- sultant</b>	<b>Comment from WG Stan- dards</b>
----------------	--------------------	---	----------------------------	--	--

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	<p><b>General remark to standards concerning tests on LPG cylinders:</b></p>	<p><b>Concerning rejection criteria in the tables where additional test decide about rejection:</b></p> <p><b>As long as there are no tests carried out, every cylinder with a defect has to be rejected and scrapped. It can not be the job of a filling station or a testing body to arrange these tests.</b></p> <p><b>These standards are therefore not suitable for the inspection and test personel!</b></p>	<p>Standards affected: prEN 14763, prEN 14767, prEN 14913, prEN 14914</p>	<p><b>5.2.3 describes the acceptance test to perform</b></p>	

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	Annex A	Inspection interval and requirements for extension to be decided by competent authority	Remark: Annex A to be excluded from RID/ADR	There is a need to harmonize the conditions under which a competent authority will extend the inspection interval	
CH	3.3	For periodic inspection the type approval and the standard used for type approval have to be considered not prEN 14427 in general	Remark: 3.3 not to use in RID/ADR		
UK	4 - Note	The UK considers the text to be invalid, as it does not meet the requirements of table P200 where the Competent Authority sets the periodicity			
UK	5.1	The UK do not agree that for transparent cylinders the internal examination can be made from the outside. The casing will mask some of the surfaces and defects may easily be missed. The UK believes that internal examination in ADR 6.2.1.6 means looking inside the cylinder.			A minimum visible area shall be specified;



Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	5.2.2	requires the entire surface to be inspected – the UK agrees - but the UK can not see how will this be done if the cylinder is held in its cage – the UK believes that the cage must be removed and this should be made clear in the text.			
UK	5.2.3	The UK considers this to be for inspections at time of fill and is not clear why it is included in this draft standard?			

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	5.2.3	The UK considers that the text implies that cylinders are in use now that have not been sufficiently tested to allow all reject criteria to be categorised – could the Standards WG confirm this.			Add in table 1: “to be provided by the manufacturer see Annex B” in front of “see 5.3.23
UK	5.3	see comment 5.1 above			
UK	5.3.1 (b)	talks about blocked or in-operative valves. But there is no test to show if valves are blocked or not - all other industrial gas standards include a puffer test.	This is a safety issue and the UK believes that the Standards WG should not be approving any standards that are not safe.		

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	5.4.2.4 (c)	The UK is unclear where the 95% of general membrane stress come from. ADR 6.2.3 calls for a maximum stress of 77% of yield. At 95% of membrane stress geometric features will yield and be damaged by the test. The UK does not believe that cylinders should be subject to any over pressure, if they are accidentally overpressurised then they can no longer be used and must be scrapped.			
UK	5.4.2.4 (d)	The UK considers the wording to be very weak and it does not ensure any minimum hold time for the test	the UK suggests that the text reverts to the minimum of 30 seconds required by TC23 standards		

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	5.4.3.2	The UK notes that the text contains no warnings about the dangers of pneumatic testing and the need to get the agreement of the Competent Authority as required by Note 1 of ADR 6.2.1.6.1.			
PW	5.4.4	a leak test at the vapour pressure of LPG (6 bar) is not foreseen in ADR/RID as an acceptable alternative for the hydraulic or pneumatic test at the test pressure.		A modification of the ADR/RID should be requested by the LPG industry at the same time this standard is proposed for reference to the Standards WG of the Joint Meeting ADR/RID.	<b>5.4.4 should be excluded.</b>
UK	5.4.4	The UK does not agree that the pneumatic leak test can replace the hydraulic test required by 6.2.1.6 of ADR - full pressure testing is required.			

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	6.1	The UK notes that the wording implies that the valve may not be removed for periodic test - ADR requires internal examination so the UK believes that valve will always be removed.			
UK	6.2	The UK is not clear why there is no requirement to use a thread gauge to check these threads?			

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	9	The UK notes that the text does not give any detailed safety precautions to be taken before scrapping a cylinder and the UK considers that the text should be amended to make sure a user of the standard understands that only a fully gas freed cylinder can be crushed, cut etc etc.			
UK	Annex A	The UK considers that Annex A is invalid for ADR cylinders			<b>The Annex should be considered as informative</b>
UK	Annex B	The UK considers that Annex B should show that minimum design thicknesses must always be observed			

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	Annex B	the UK is unclear as to the meaning of 'severe corrosion' – could the Standards WG clarify this?			
<b>Decision of the Standards Working Group:</b>		<b>Accepted:</b>	<b>Comments: WG did not accept in view of the number of restrictions that would need to be included in the reference</b>		
		<b>Refused: X</b>			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
EN ISO 10156-2	Gas cylinders – Gases and gas mixtures –Part 2: Determination of oxidising ability of toxic and corrosive gases and gas mixtures	2.2.2.1.5	NA
<i>Comments from members of the Joint Meeting:</i>			

Country	Clause No./	Paragraph/Figure/Table/Note (e.g. Table 1)	Type of comment (Editorial/Technical)	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards

Reference		Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
CH	All	<p><b>EN ISO 10156-2 has already been published! (August 2005)</b></p> <p><b>ISO 10156</b> Gases and gas mixtures- Determination of fire potential and oxidizing ability for the selection of cylinder valve outlets</p>	<p><b>ISO 10156-2 to be placed in RID/ADR 2.2.2.1.5</b></p> <p><b>ISO 10156 to be placed in RID/ADR 6.2.2 either for materials or for closures</b></p>	<p><b>Agree</b></p> <p><b>There are no requirements for valve outlets in ADR/RID</b></p>
Decision of the Standards Working Group:		Accepted: <input checked="" type="checkbox"/>	Refused: <input type="checkbox"/>	Comments:

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN ISO 11114-4	<p><b>Transportable gas cylinders - Compatibility of cylinder and valve materials with gas contents - Part 4: Test methods for selecting metallic materials resistant to hydrogen embrittlement</b></p>	6.2.2	

*Comments from members of the Joint Meeting:*

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH		--			



<b>UK</b>		Method C is based on an ASTM approach and uses pre-cracks in air. Since 90% of the time a crack spends is in the nucleating stage, the UK does not consider that this precrack in air approach is realistic.	The UK recommends that the Standards WG does not approve the use Method C for this standard and that Method C be excluded from RID/ADR.	<b>Same comment is included in European appendix of the standard</b>	
Decision of the Standards Working Group:		<b>Accepted: X</b> Refused: <input type="checkbox"/>	Comments: accepted with <i>Note: Method C shall not be used for receptacles approved under RID/ADR</i>		

*Dispatch from CEN dated 9 May 2005*

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 1440: 1996 RE-VIEW	Transportable refillable welded and brazed steel Liquefied Petroleum Gas (LPG) cylinders - Periodic inspection	Now in P200 (10) v (b); in the future in P200 (11)	P200 (10) v (b)

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	Whole Standard	There is already a standard for the periodic inspection of welded steel cylinders mentioned in RID/ADR (EN 1803)	this standard is therefore unnecessary.		
CH	1 "This European Standard specifies inspection intervals,...."	The inspection interval is specified by RID/ADR	Remark: Inspection intervals in accordance with RID/ADR		
CH	3.5	Protected cylinders are not cylinders in accordance with RID/ADR, this type of cylinders has already been discussed in the joint meeting and has been rejected.	Remark in RID/ADR where the Standard is placed		
CH	4 Interval	The general interval in accordance to RID/ADR is 10 Years, 15 years is the exemption	Remark		
UK	4	there is a need to change sentence starting 'An interval of 10 years' to	an interval of 10 years shall apply if any of the conditions in annex A are not met or if the Competent Authority has not given agreement to an extended period'		

CH	4 / 5 The inspection Procedures to be applied shall be selected from the alternatives given in clause 5	<p>The inspection procedures have to be in accordance with RID/ADR.</p> <p>For the periodic inspection according to RID/ADR a hydraulic test has to be applied at test pressure. It could be replaced by a pneumatic test pressure but not by other tests.</p> <p>A leak test a low pressure cannot replace the pressure test.</p>	Remark: Inspection in accordance with RID/ADR		
UK	5.1	the text does not specify the need for an internal examination as required by 6.2.1.6 of ADR			
CH	5.2 External Visual Inspection	Checking the marking is also a part of the visual inspection in accordance with RID/ADR	amend		
UK	5.3.1	talks about blocked or inoperative valves. But there is no test to show if valves are blocked or not - all other industrial gas standards include a puffer test. This is a safety issue and the UK believes that the Standards WG should not be approving any standards that are not safe.			

UK	5.3.2.4 (d)	The UK is not clear where the 95% of general membrane stress comes from. ADR 6.2.3 calls for a maximum stress of 77% of yield. At 95% of membrane stress geometric features will yield and be damaged by the test. The UK believes that cylinders must not be subject to any over pressure, if they are accidentally then they can no longer be used and must be scrapped.	The UK suggests that the text reverts to the previously agreed wording in EN1440.1996.		
UK	5.3.2.4 (e)	the wording is very weak and does not ensure any minimum hold time for the test	the text reverts to the minimum of 30 seconds required by TC23 standards.		
CH	5.3.2.4 Note Welding or repairing should be carried out in accordance with the manufacturers requirements	Repair procedures have to be as agreed with the competent authority.			
UK	5.3.2.4 Note	repairs by welding is not allowed by 4.1.6.11 of ADR	this note should be removed		

PW	5.3.3 (also 5.1)	Visual internal inspection is allowed as an alternative to the hydraulic pressure test; this is not the case in ADR/RID 6.2.1.6.1		This possibility was already in the referred version of standard EN 1440:1996; to be clarified when this standard is proposed for reference to the Standards WG of the Joint Meeting ADR/RID.	
UK	5.3.4	the text contains no warnings about the dangers of pneumatic testing and the need to get the agreement of the Competent Authority as required by Note 1 of ADR 6.2.1.6.1.			
PW	<b>5.3.5</b>	A leakage test at the vapour pressure of LPG (6 bar) is not foreseen in ADR/RID as an acceptable alternative for the hydraulic or pneumatic test at the test pressure.		A modification of the ADR/RID should be requested by the LPG industry at the same time this standard is proposed for reference to the Standards WG of the Joint Meeting ADR/RID.	
PW	5.4.4	The possibility to replace testing of each cylinder by testing of samples is not foreseen in ADR/RID		A modification of the ADR/RID should be requested by the LPG industry.	

UK	5.4	this text does not meet the requirements of ADR 6.2.1.6 for an external examination and this proposal was rejected when submitted on an earlier AEGPL paper.			
UK	6.1	the wording implies that the valve may not be removed for periodic test - ADR requires internal examination so the UK believes that the valve will always be removed.			
UK	6.2	why there is no requirement to use a thread gauge to check these threads?			
UK	7.1	the drying of cylinders is very important and is not clear why insufficient guidance is given in this draft standard on the drying of cylinders.			
CH	7.4	The marking has to be in accordance with RID/ADR			
UK	Annex B	should not be included, as the Joint Meeting has already rejected it.			
<b>Decision of the Standards Working Group:</b>		<b>Accepted:</b> <input type="checkbox"/>	<b>Comments:</b> <b>Not discussed</b>		
		<b>Refused:</b> <input type="checkbox"/>			

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
EN12252:2000/prREV	Equipping of Liquefied Petroleum Gases (LPG) road tankers	Already referred to in 6.8.2.6	6.8.3.2 with the exception of 6.8.3.2.3

*Comments from members of the Joint Meeting:*

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	9.2.6 Leak test	<p>“If the Tank is in gas service the leak proofness test shall be not less than 20% of the test pressure the LPG vapour pressure”</p> <p>The meaning of this sentence is not clear; ADR requires at any time 20% of the test pressure for leakproofness test.</p> <p>(6.8.3.4.9)</p>	<p><b>Ammend sentence to:</b></p> <p><b>or the LPG vapour pressure if higher</b></p>	<p>“not less than “ allows the vapour pressure of the gas to be higher</p>	

<b>CH</b>	Annex A:	<p>“The pressure valve shall be set to the design pressure of the tank, see EN12493”</p> <p>This is a deviation to ADR which requires: “These valves shall be capable of opening automatically under a pressure <b>between 0.9 and 1.0 times the test pressure of the tank</b> to which they are fitted”</p> <p>These pressures are different</p>	<b>Remark</b> <b>Annex A to be excluded from ADR</b>	<b>Annex A is informative</b>	
<b>CH</b>	<b>A.2</b>	<p>Examples</p> <p>Note: The calculations are based on a set pressure of <b>17 bar/gauge</b></p> <p>ADR requires: ”These valves shall be capable of opening automatically under a pressure <b>between 0.9 and 1.0 times the test pressure of the tank</b> to which they are fitted”</p> <p>→ 6.8.3.2.9</p> <p>Test Pressure → Table 4.3.3.2.5</p> <p>In ADR, the test pressure of these tanks can be 27 bars; the setting of the safety valve shall therefore be 24.3 bars</p>			
<b>Decision of the Standards Working Group:</b>		<b>Accepted:</b> <input type="checkbox"/> <b>Refused:</b> <input type="checkbox"/>	<b>Comments:</b> <b>Not discussed</b>		



Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14795	Transportable refillable aluminium cylinders for Liquefied Petroleum Gas (LPG) - Periodic inspection	P 200 (11)	P200 (10) v (b)

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	5.1	Reconditioning procedures have to be as agreed with the competent authority.			
CH	5.1	The inspection procedures have to be in accordance with RID/ADR.  For the periodic inspection according to RID/ADR a hydraulic test has to be applied at test pressure. It could be replaced by a pneumatic test pressure but by the agreement of the testing and certifying body.	Remark: Inspection in accordance with RID/ADR		
UK	5.2	the text does not give sufficient information on the lighting levels to be achieved. 6.2.1.6 of ADR requires External Examination and the UK believes this cannot be carried out in poor lighting.			
UK	5.3.1	talks about blocked or in-operative valves. But there is no test to show if valves are blocked or not - all other industrial gas standards include a puffer test. This is a safety issue and the UK believes that the Standards WG should not be approving any standards that are not safe.			

UK	5.4.2.4 d	The UK is not clear where the 95% of general membrane stress come from. ADR 6.2.3 calls for a maximum stress of 77% of yield. At 95% of membrane stress geometric features will yield and be damaged by the test. The UK believes that cylinders must not be subject to any over pressure, if they are accidentally over-pressurised then they can no longer be used and must be scrapped.	The UK suggests that the standard revert to the previously agreed wording in EN1440.1996		
UK	5.4.2.4 (e)	the wording is very weak and it does not ensure any minimum hold time for the test	the UK suggests that the text reverts to the minimum of 30 seconds required by TC23 standards		
UK	5.4.2.4 Note	repair by welding is not allowed by 4.1.6.11 of ADR	this note should be removed.		
UK	5.4.3	the text contains no warnings about the dangers of pneumatic testing and the need to get the agreement required by Note 1 of ADR 6.2.1.6.1.			
UK	6.1	the wording implies that the valve may not be removed for periodic test - ADR requires internal examination so the UK believes that the valve will always be removed.			
UK	6.2	The UK is not clear why is there no requirement to use a thread gauge to check these threads?			
CH	7.4	Marking in accordance with RID/ADR	prEN 14894 not to be used		
<b>Decision of the Standards Working Group:</b>		<b>Accepted:</b> <input type="checkbox"/> <b>Refused:</b> <input type="checkbox"/>	<b>Comments:</b> Not discussed		

**Dispatch from CEN dated July 2005**

Reference	Title of document		Where to refer in ADR/RID	Applicable sub-sections and paragraphs			
EN 13322-1:2003/ prA1	Transportable gas cylinders - Refillable welded steel gas cylinders - Design and construction - Part 1: Carbon steel		Already referred to in 6.2.2	6.2.1.1 and 6.2.1.5			
<i>Comments from members of the Joint Meeting:</i>							
Country	Clause No./	Paragraph/ Figure/Table/Note (e.g. Table 1)	Type of comment (Editorial/ Technical)	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH				--		New references to material	
Decision of the Standards Working Group:			Accepted: <input checked="" type="checkbox"/>	Refused: <input type="checkbox"/>	Comments:		

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN ISO10297	Transportable gas cylinders – Cylinder valves – Specification and type testing	Already referred to in 6.2.5.2; will replace EN949 in 6.2.2	6.2.1.1

*Comments from members of the Joint Meeting:*

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH		prEN ISO 10297 has been published!		This standard is a revision of the 1999 edition to be aligned with EN 849	
UK	3.2	The UK considers that valve test pressure is confusing and could be mixed up with the hydraulic test pressure. The UK believes that in the text it should be made clear that P <sub>vt</sub> is not the hydraulic test pressure.		Same as in EN 849	
UK	3.9	The UK welcomes the extension to EN849 to other forms of valve actuation, which will take away the uncertainty of the standard for use when no valve handles are specified.			
UK	6.2(d)	recent failure investigations the UK have found that compatibility testing is not fully understood by the manufacturers and the UK would suggest 'as required' be removed from paragraph 6.2(d)		See 4.3 reference to ISO 11114-1, -2; technical comment for the TC	
UK	6.3	The UK notes that the testing does not include any sample valves for compatibility testing and a lack of this testing has lead directly to a number of recent valve failures in UK.		Technical comment for the TC	
UK	6.8(e)	The UK notes that the test pressure of 1.5*1.5P <sub>w</sub> is given for compressed gases, this is correct against the requirements of P200 coupled with the requirement of this standard to go to 1.5 times the hydraulic test pressure of the cylinder – but the UK questions why this is not written as 2.25*P <sub>w</sub> ?		Editorial comment for next revision	

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	7	The working or test pressure should also be marked		Technical comment for the TC for a future revision	
Decision of the Standards Working Group:		Accepted: <input checked="" type="checkbox"/> Refused: <input type="checkbox"/>	Comments:		

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14912	LPG equipment and accessories – Inspection and maintenance of LPG cylinder valves at time of periodic inspection of cylinders		

*Comments from members of the Joint Meeting:*

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	All	As with EN 14189 there is already a Standard for the periodic inspection of valves in RDID/ADR there is no need for a additional on.			

<b>UK</b>	4.4	talks about blocked or inoperative valves. But there is no test to show if valves are blocked or not - all other industrial gas standards include a puffer. This is a safety issue and the UK does not consider that the Standards WG should be approving any standards that are not safe.			
<b>UK</b>	4.4 Note 2	The UK believes that this is an unsafe practice that should not be encouraged in a European standard.			
<b>UK</b>		The UK requests that the Standards WG clarifies if the requirements of Chapter 6.2.1.6 should relate to pressure receptacles <i>and their closures</i> or just to pressure receptacles. If it does relate to their closures then clearly this standard is not fully addressing all of the requirements of periodic examination and only using 6.3 coupled with 7.1 testing should be allowed in RID/ADR.			
<b>Decision of the Standards Working Group:</b>		<b>Accepted:</b> <input type="checkbox"/> <b>Refused:</b> <input type="checkbox"/>	<b>Comments:</b> <b>Not discussed</b>		

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14913	Transportable refillable welded steel cylinders for Liquefied Petroleum Gas (LPG) – Alternative design and construction -	P200 (11)	P200 (10) ta and (7)

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
	Procedure for checking before, during and after filling		

*Comments from members of the Joint Meeting:*

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	All	It is not clear why there has to be an additional standard for these cylinders as there is no difference for the inspection. A filer will not be able to distinguish between cylinders manufactured to different standards.	This standard should therefore not be mentioned in RID/ADR.		
CH	General remark to standards concerning tests on LPG cylinders:	As long as there are no tests carried out, every cylinder with a defect has to be rejected and scrapped. It can not be the job of a filling station or a testing body to arrange these tests.	These standards are therefore not suitable for the inspection and test personell!  Standards affected: prEN14763, prEN 14767, prEN 14913, prEN 14914		

<b>UK</b>	4.2 (e)	The UK do not agree with this statement and it has no scientific grounding.	The UK considers that the whole of the external surface of the cylinder must be inspected.		
<b>UK</b>	5 para 4	The UK does not consider that this is a safe practice and it should not be included in this standard. The UK considers that valve removal should be dealt with in the periodic examination standard.			
<b>UK</b>	7.2	As soon as reasonably practicable is not definite enough in a standard. Overfill can quickly lead to overstress and burst. The degree of overfill will determine how quickly the filler must react and the UK believes that this should be reflected in the text.			
<b>CH</b>	<b>Annex A Table A.1</b>	<b>It is not visible which area shall be used for RID/ADR cylinders</b>	<b>Remark: for RID/ADR only Area I is applicable</b>		
<b>Decision of the Standards Working Group:</b>		<b>Accepted:</b> <input type="checkbox"/> <b>Refused:</b> <input checked="" type="checkbox"/>	<b>Comments: The WG does not see any need to refer to this</b>		



		standard that should be merged with EN 1439
--	--	---

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
prEN 14914	Transportable refillable welded steel cylinders for Liquefied Petroleum Gas (LPG) – Alternative design and construction - Periodic inspection	P 200 (11)	P200 (10) v (b)

*Comments from members of the Joint Meeting:*

Country	Clause No./	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	All	It is not clear why there has to be an additional standard for these cylinders as there is no difference for the inspection. A filer will not be able to distinguish between cylinders manufactured to different standards.	This standard should therefore not be mentioned in RID/ADR.		

CH	General remark to standards concerning tests on LPG cylinders:	As long as there are no tests carried out, every cylinder with a defect has to be rejected and scrapped. It can not be the job of a filling station or a testing body to arrange these tests.	These standards are therefore not suitable for the inspection and test personell!  Standards affected: prEN 14763, prEN 14767, prEN 14913, prEN 14914		
UK	4	change sentence starting 'An interval of 10 years' to 'an interval of 10 years shall apply if any of the conditions in annex A are not met or if the Competent Authority has not given agreement to an extended period'.			
UK	5.1	The UK does not consider the text to be correct as it does not specify the need for an internal examination or hydraulic test as required by 6.2.1.6 of ADR.			
CH	5.1	The inspection procedures have to be in accordance with RID/ADR.  For the periodic inspection according to RID/ADR a hydraulic test has to be applied at test pressure. It could be replaced by a pneumatic test pressure with the agreement of the testing and certifying body.  Internal inspection is mandatory.	Remark: Inspection in accordance with RID/ADR		

<b>UK</b>	5.3.1	talks about blocked or inoperative valves. But there is no test to show if valves are blocked or not - all other industrial gas standards include a puffer test. This is a safety issue and the UK considers that the Standards WG should not be approving any standards that are not safe			
<b>UK</b>	5.3.2.4 (d)	The UK is unclear where the 95% of general membrane stress come from. ADR 6.2.3 calls for a maximum stress of 77% of yield. At 95% of membrane stress geometric features will yield and be damaged by the test. The UK believes that cylinders must not be subject to any over pressure, if they are accidentally overpressurised then they can no longer be used and must be scrapped.			
<b>UK</b>	5.3.2.4 (e)	The UK considers the wording to be very weak as it does not ensure any minimum hold time for the test – the UK suggests that the standard reverts to the minimum of 30 seconds required by TC23 standards.			
<b>UK</b>	5.3.2.4 Note	The UK reminds the Standards WG that repairs by welding are not allowed by 4.1.6.11 of ADR and the UK recommends that this note be removed			

<b>UK</b>	5.3.4	The UK notes that the text contains no warnings about the dangers of pneumatic testing and the need to get the agreement of the Competent Authority as required by Note 1 of ADR 6.2.1.6.1			
<b>UK</b>	6.1	The UK considers that the wording implies that the valve may not be removed for periodic test - ADR requires internal examination so the UK believes that the valve will always be removed.			
<b>UK</b>	6.2	The UK questions why is there no requirement to use a thread gauge to check these threads?			
<b>UK</b>	7.1	The UK considers that it is very important to ensure that cylinders are fully dried after testing and believes that insufficient guidance is given in this draft standard on the drying of cylinders.			
<b>CH</b>	<b>7.4</b>	<b>Marking in accordance with RID/ADR</b>	<b>prEN 14894 not to be used</b>		
<b>CH</b>	<b>Annex A</b>	<b>Inspection interval and requirements for extension to be decided by competent authority</b>	<b>Remark: Annex A to be excluded from RID/ADR</b>		
<b>UK</b>	Annex B	The UK considers that Annex B should not be included, as the Joint Meeting has already rejected this type of cylinder.	<b>Delete Annex B</b>		
<b>Decision of the Standards Working Group:</b>		Accepted: <input type="checkbox"/> Refused: <input type="checkbox"/>	<b>Comments: Not discussed</b>		

Reference	Title of document	Where to refer in ADR/RID	Applicable sub-sections and paragraphs
EN 14427:2004 prA1	Transportable composite cylinders for LPG – Design and construction	Already referred to in 6.2.2	6.2.1.1, 6.2.1.5 and 6.2.1.7

*Comments from members of the Joint Meeting:*

Country	Type of comment (Editorial/ Technical)	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH		Remark by the CEN Consultant must be followed	This remark has to be stated in RID/ADR otherwise A1 has to be cancelled for RID/ADR		a note in the reference should be added to cover the comment
Decision of the Standards Working Group:			Accepted: <input checked="" type="checkbox"/> Refused: <input type="checkbox"/>	Comments: <i>Accepted with the Note: In 5.2.9.2.1 and 5.2.9.3.1, both cylinders shall be subject to a burst test when they show damage equal to or worse than the rejection criteria.</i>	