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Working Party on the Transport of Dangerous Goods

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STANDARDS

Battery vehicles : referencing of standards 13385:2002 and 13720:2002 in ADR

Transmitted by the Government of the United Kingdom

Introduction

RID/ADR includes, under P200 (11), references to four EN standards (EN 12754 : 2001, EN 13365 :2002, EN 1801 :1998 and EN 12755 :2000) which specify criteria for filling UN MEGCs. Paragraph 4.2.4.5.2 requires compliance with these standards.

There are no equivalent requirements for filling RID/ADR MEGCs, battery vehicles and wagons, although standards exist in EN 13385 : 2002 and EN 13720 :2002. This clearly represents a gap in the Regulations.

This situation could be remedied by including references to the appropriate EN standards in P200 and requiring compliance with the same under 4.3.3.2.5.

Proposal

1 Include references to EN 13385 : 2002 and EN 13720 : 2002 in the table under P200 (11) at 4.1.4.1 (11).

2) Add a paragraph to 4.3.3.2.5 specifying compliance with P200 for battery vehicles/wagons and MEGCs having elements which are cylinders, tubes, pressure drums and bundles of cylinders.

Justification

The Regulations rightly specify requirements for filling UN MEGCs and should also do so for filling battery vehicles/wagons and RID/ADR MEGCs.

EN 13385:2002 and EN 13720: 2002 are similar in intent to the four standards which form the basis for RID/ADR requirements for UN MEGCs.

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Safety implications:

Safety will be improved by specifying standards in relation to filling.

Feasibility:

No difficulties : similar provisions already exist for UN MEGCs.

Enforceability:

No difficulties : as for UN MEGCs.