

**ECONOMIC COMMISSION FOR EUROPE**

**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

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**REPORTS OF INFORMAL WORKING GROUPS**

Working Group on periodicity of testing of cylinders

Comments of Belgium to document INF. 8

1. In the report of the working group on periodicity of testing of cylinders, item 4. of the conclusions states the following :

*"4. Cylinders with a type approval according to RID/ADR and EN 1442 were introduced first in 1997. Such cylinders should be eligible for the new system. Cylinders manufactured prior to 1997 were manufactured according to national standards and therefore have not automatically proved to be eligible for the new system. Therefore an assessment by the competent authority or an inspection body according to 1.8.6 and 1.8.7 RID/ADR/ADN (further called "1.8.6-body") should be made to prove that the cylinders present an equivalent technical and safety standard as required by RID/ADR/ADN in connection with EN 1442. This could be done for an existing type approval or for a lot of identical cylinders as specified in the assessment."*

~~+~~This of course is true, but it overlooks the fact that :

- the application of the referenced standards will only become obligatory as from the 1<sup>st</sup> of January 2009. Thousands of welded steel cylinders for LPG have been constructed according to national standards (e.g. EU Directive 84/527/EC) after 1.1.1997, and for many of these the interval between inspections has been extended to 15 years (in Belgium, but no doubt also in other countries) ;
- even after that date, another referenced standard (EN 13322) may be used as an alternative to EN 1442 for the construction of welded steel cylinders for LPG.

Cylinders with a type approval according to RID/ADR and any of the referenced standards (EN 1442 or EN 13322) should be eligible for the new system, and not only those according to RID/ADR and EN 1442. Moreover, the assessment to prove the technical and safety equivalence should be possible for all cylinders constructed before the 1<sup>st</sup> of January 2009 according to national standards.

2. In the discussion paper of Annex II, paragraph X.3.5 states :

*“In case of external corrosion on a cylinder, the filling centre shall take appropriate measures to remove corrosion and to repaint the treated parts as appropriate before refilling with LPG.”*

It is not up to the filling centre to take these measures. They have to refuse refilling and – at the most – inform the owner of the reason for this decision.

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