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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 25-28 March 2008
Item 5 a) of the provisional agenda

PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN ^{*/ **/}

4.1.6 – Special packing provisions for Class 2: EN ISO standards

Transmitted by the Government of the United Kingdom

SUMMARY

Executive summary: Construction standards for UN pressure receptacles will be mandatory in Chapters 6.2 and 6.8 of RID/ADR from 2009. This should be clearly stated in the text. Procedural standards, which would in any case be difficult to inspect, should not be mandatory. RID/ADR currently uses different formats in its references to standards. This can be confusing and a uniform format should be adopted.

^{*/} In accordance with the programme of work of the Inland Transport Committee for 2006-2010 (ECE/TRANS/166/Add.1, programme activity 02.7 (c)).

^{**/} Circulated by the Intergovernmental Organization for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2008/9.

Action to be taken:	Amend RID/ADR to distinguish between the mandatory application of construction standards for cylinders and the non mandatory nature of procedural standards; standardise the format for references to standards.
Related documents:	INF.16 submitted to WP.15 by the UK in November 2007; ECE/TRANS/WP.15/AC.1/2008/5 submitted by OTIF.

Introduction

1. In INF.16, presented to WP.15 in November 2007, the UK pointed out that the use of standards for UN pressure receptacles would be mandatory in Chapters 6.2 and 6.8 from 2009 and proposed an amendment to the text preceding paragraph 4.1.6.14 to signal this change. Delegates felt that the issues needed further discussion.
2. The UK has also since given further thought to the application of the standards and now considers that it is probably necessary to draw a distinction between those standards which relate to construction and those which relate to procedures. Construction standards are and should be mandatory for all cylinders, but this is not automatically the case for procedural standards.
3. In 4.1.6.14, the majority of standards relate to construction. ISO 11621, however, deals with procedural issues and its aims could be achieved equally well by implementing alternatives to the prescribed measures. Including a standard of this type in a mandatory list could therefore be seen as a new development in RID/ADR philosophy – although it could also be viewed as an alignment with UN, since compliance with procedural standards is already mandatory for UN cylinders. It would be helpful to hear other delegates' views on this, but the UK position is that it would generally not be helpful to move in this direction. This is not only because there are acceptable alternatives, but also because of the resource implications for contracting parties required to audit filling centres against the new requirements.
4. If delegates to the Joint Meeting are of a different view and ISO 11621 is to be mandatory, it follows that the standards listed in P200 (11), which are also procedural, should also be mandatory. The UK proposal for an amendment does not cover this option, but only offers wording based on a constructional/procedural distinction for cylinders other than UN cylinders.
5. Separately, the references to ISOs 11114-1, 1114-2 and 11621, should be followed by the Note which is inserted in the 2009 version of Chapter 6.2, for all ISO standards which are published as EN ISO standards.
6. The entry for ISO 10297 which was updated in Corrigendum 1 of RID/ADR 2007 is already listed as EN ISO 10297:2006. It might be simpler, unless the Secretariat objects, to standardise the references to an ISO with a Note. (The alternative would be to simply use EN ISOs, but the Note format was adopted in 6.2.2 to avoid possible restriction of the UN text.)

Proposal

7. Amend 4.1.6.14 as follows:

"4.1.6.14 For UN pressure receptacles, the ISO standards listed below shall be applied. For other pressure receptacles, the requirements of sub-section 4.1.6.4 are considered to have been complied with if the following standards, as relevant, are applied:

Applicable paragraphs	Reference	Title of document
4.1.6.4	ISO 11621:2005	Gas cylinders – Procedures for change of gas service <i>NOTE: The EN version of this ISO standard fulfils the requirements and may also be used.</i>

The following standards shall be applied for all pressure receptacles, as relevant:

Applicable paragraphs	Reference	Title of document
4.1.6.2	ISO 11114-1:1997	Transportable gas cylinders – Compatibility of cylinder and valve materials with gas contents – Part 1: Metallic Materials <i>NOTE: The EN version of this ISO standard fulfils the requirements and may also be used.</i>
	ISO 11114-2:2000	Transportable gas cylinders – Compatibility of cylinder and valve materials with gas contents – Part 2: Non-metallic Materials <i>NOTE: The EN version of this ISO standard fulfils the requirements and may also be used.</i>
4.1.6.8 Valves with inherent protection	Annex A of ISO 10297:2006	Gas cylinder – Refillable gas cylinder valves – Specification and type testing <i>NOTE: The EN version of this ISO standard fulfils the requirements and may also be used.</i>
	EN 13152:2001	Testing and specifications of LPG cylinder valves – self closing
	EN 13153:2001	Testing and specifications of LPG cylinder valves – manually operated
4.1.6.8 (b) and (c)	ISO 11117:1998	Gas Cylinders – Valve Protection caps and valve guards for industrial and medical gas cylinders – Design construction and tests
	EN 962:1996 + A2:2000	Valve protection caps and valve guards for industrial and medical gas cylinders – Design, construction and tests

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Justification

Safety implications: No change.

Feasibility: No problems.

Enforceability: No problems with this proposal, but inspecting against procedural standards would have significant resource implications.
