

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

Geneva, 23-26 March 2009

Item 3 of the agenda

STANDARDS

**Report of the Standards Working Group
(12th meeting)**

1. The Standards Working Group (STD's WG) met outside the plenary sessions of the Joint Meeting under the chairmanship of Mr Karol Wieser. It was tasked by the Plenary Meeting to consider
 - the pending issues from earlier sessions of the STD's WG,
 - the consolidated comments on the standards submitted to the delegates of the Joint Meeting as documented and distributed by **INF.14**;
 - item No. 1 of **INF.8**, recalling an earlier suggestion by the tank working group and supported by the Joint Meeting to extend the scope of application of EN 14025 to all gas tanks.
2. Results:
 - 2.1 The texts to refer to EN ISO 11117:2008 and EN 13082: 2008 in ADR/RID 2011 are proposed to be dealt together with the amendments of tables in 6.2.4.1 and 6.8.2.6 following the proposals in ECE/TRANS/WP.15/AC.1/2009/3 (ECMA-paper) with respect to the periods of validity.
 - 2.2 Any proposal on a reference to prEN 12245, prEN 1626 and prEN 13648-1 is postponed until the STD's WG is provided with revised documents where the comments agreed upon during the September 2008 meeting have been considered¹.
 - 2.3 With respect to prEN 15507 the STD'S WG takes note of the decision of the Joint Meeting to establish an inter-session ad-hoc group to resolve the concerns about this standard put forward in plenary and await the results expected to be submitted for the September session.
 - 2.4 In consultation with experts from CEN/TC 296 the STD's WG confirms that the scope of EN 14025:2008 doesn't exclude gas tanks. Furthermore, the scope refers to specific standards dedicated to road tankers for the transport of LPG (EN 12493) and tanks for the transport of cryogenic liquids (EN 13530-1 and -2). EN 14025 is applicable and is applied also for road and rail tanks for transport of gases.

As a consequence, the STD's WG sees no need to influence TC 296 to amend the scope of EN 14025. However, it proposes that the field of applicability of the existing reference in ADR/RID, **in the table in 6.8.2.6** is widened as follows (table already adapted as proposed in ECE/TRANS/WP.15/AC.1/2009/3 (ECMA-paper):

¹ Generally, the STD's WG can only deal with information in writing which is distributed in due time to be distributed and considered before the meetings.

Reference	Title of document	Applicable sub-sections and paragraphs	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
(1)	(2)	(3)	(4)	(5)
EN 14025:2008	Tanks for the transport of dangerous goods - Metallic pressure tanks – Design and construction	6.8.2.1 and 6.8.3.1	Until further notice	

2.5 The proposals to adopt the reference to standards that are at stage 3 (Formal vote) are indicated below. It is recommended to amend the existing reference to EN 12807 **in the table in 6.2.4.1.1** as follows (table already adapted as proposed in ECE/TRANS/WP.15/AC.1/2009/3 (ECMA-paper). A recommendation on the transition clauses need to be considered together with similar cases where the STD's WG is asked to answer the 2- or 10 years transition period.

Reference	Title of document	Applicable sub-sections and paragraphs	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
(1)	(2)	(3)	(4)	(5)
<i>for design and construction</i>				
EN 12807:2001 (except Annex A)	Transportable refillable brazed steel cylinders for liquefied petroleum gas (LPG) – Design and construction	6.2.3.1 and 6.2.3.4	<u>31.12.2012</u>	[to be decided]
<u>EN 12807:2008</u>	<u>Transportable refillable brazed steel cylinders for liquefied petroleum gas (LPG) – Design and construction</u>	<u>6.2.3.1 and 6.2.3.4</u>	<u>Until further notice</u>	

2.6 A recommendation on an amendment reference to the revised EN ISO 13769:2009 was not taken, following the deletion of all existing references to marking standards as proposed in ECE/TRANS/WP.15/AC.1/2009/3 (ECMA-paper). However, the revised version of EN ISO 13769:2009 has been declared as accepted as normative reference in standards. This is understood that such a reference to EN ISO 13769:2009 in a design standard (“Normative reference”) is considered compliant with the present version of ADR/RID.

2.7 A reference to EN 15551 in RID, TE22 intended to replace the existing reference to the UIC leaflet 573 was postponed, as this standard would need to be combined with an additional normative document on the design of the wagon structure, to cover all requirements of UIC 573.

Detailed results on all discussed standards are summarized on the following pages.

A. Standards at Stage 2: Submitted for Public Enquiry

2. Dispatch from CEN on 20 November 2008

prEN 12561-1	Railway applications - Tank wagons - Part 1: Identification plates for tank wagons for the carriage of dangerous goods		Where to refer in ADR/RID: Reference not supported	Applicable sub-sections and paragraphs: Not relevant	
CEN consultants assessment dated 10.12.2008					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comments from WG Standards
UK	Parts 1 to 8 in general	We would agree with the CEN Consultant's assessments that none of these Standards is considered a candidate to be referenced in RID. We also agree with the general comments made, in particular the conclusions of earlier assessments which have been endorsed as still valid. The Standards may well benefit some industry in that they can ensure uniform dimensions and positioning of equipment but generally they do not deal with the safety aspects of tank wagon equipment used for dangerous goods as addressed by RID. Often the type of equipment will be specified in detail rather than providing a performance specification, e.g. leakproofness, so that there is little scope to reflect technical developments in equipment design or alternative designs. As an example, see the specific comments on prEN 12561-2 below. Now that the Standards referenced in RID are mandatory, this exacerbates the shortcomings and problems with these Standards.		-/-	The STD's WG agrees – in combination with the comments related to specific parts of this standard series - that none of the parts of this standard should be referenced in RID. Following the detailed comments the standard series would no longer deal with subjects regulated by RID. As a consequence, any relationship with RID (and the RID –Framework Directive) stated in this standard should then be deleted.
UK	General to Part 1	It had been previously agreed that marking for tank wagons for dangerous goods should be dealt with by TC256 and hence currently EN12972 only deals with tank plates for road tank vehicles and tank containers (and portable tanks). We would tend to agree with the CEN Consultant's recommendation that this prEN should not be promoted to the formal vote stage and that this subject should now be dealt with by EN12972 to ensure a consistency of approach for the tank plates for road tank vehicles, tank containers and tank wagons.		Suppose UK is proposing that CEN TC 296 should deal with the subject.	Taking account of the detected non-compliances with RID marking provisions, the difficulties to keep it compliant with RID and the fact that marking details are already included in EN 12972 for road tank vehicles etc. in a similar way, the STD's WG recommends that this Part is deleted in favour of an amendment of EN 12972. An amendment of EN 12972 will need to be revised anyway to include the agreed general clause on the precedence of the legal ADR/RID marking provisions -see comment on EN ISO 13769. EN 15877-1, dedicated to the marking of rail freight wagons in general would then need to take revised EN 12972 instead of EN 12561-1

					into reference. The reference to EN 12972 in ADR/RID would then be proposed to include applicability for marking as well.
CH	General to Parts 1-6	In general it is said that at the moment these standards contain too many errors and ambiguities and to less substance. In addition the first 6 parts could have been incorporated in only one standard. Therefore the whole package as it stands now will be dismissed by CH. Diese Normreihe beinhaltet zu viele Fehler, Unklarheiten und zu wenig Substanz. Alle 6 Teile hätten in einem Dokument Platz gefunden. Wir lehnen deshalb dies Normen als ganzes Paket ab.		To be considered by CEN TC 256/WG 20	See above.
CH	General to Part 1	In der Norm EN 12972 "Tanks für die Beförderung gefährlicher Güter - Prüfung, Inspektion und Kennzeichnung von Metalltanks", die für Bahnkesselwagen anwendbar ist, wird auf die Norm EN 12561-1 verwiesen. Leider stimmt die Nummerierung in beiden Normen nicht überein und die Angabe bezüglich Charaktergröße auch nicht (EN 12972: 3 mm; EN 12561: 4 mm). Auf dem Kennzeichnungsschild nach der Norm stehen andere Ausdrücke als im RID/ADR unter 6.8.2.5.1: - "Fassungsvermögen" - "Fassungsraum" - "externer Berechnungsdruck" - "äußerer Auslegungsdruck" - "Rauminhalt" - "Fassungsraum". Was bringt die Angabe vom Berechnungsdruck (12) auf dem Schild von BKW für flüssige und feste Stoffe? Im RID ist dieser Wert auf dem Schild nicht verlangt.	Consultants translation: EN 12561-1 is referenced in EN 12972 ... applicable also to rail tank wagons. Unfortunately, marking details differ between both standards, such as the size of marking characters (EN 12972:3 mm, EN 1256: 4mm.) Marking elements on tank plate are differently termed in the standard compared with RID/ADR 6.8.2.5.1 ((examples may relate to the German version only)). What is the use of the indicated design pressure? RID doesn't require this item.	Either concordance between both standards is achieved or both standards are merged. To be edited. Technical question. In principle, additional marking elements are not prohibited.	See above. No longer relevant if general proposal is adopted To be discussed in context in combination with the suggested amendment of EN 12972.
CH	Clause 5	Im Kap. 5 heißt der Titel "Kennzeichnungsschilder für flüssige und feste Stoffe" und im Kapitel 1 "Anwendungsbereich" heißt es, dass die Norm (außer für verflüssigte Gase) für Stoffe...im flüssigen Zustand gilt. Verwirrend!	The title of clause 5 „Marking plates for liquid and solid substances“ where Clause 1, Scope declares the standard applicable for liquid substances (except liquefied gases) – confusing!	To be edited.	To be discussed in context in combination with the suggested amendment of EN 12972.

prEN 12561-2		Railway applications - Tank wagons - Part 2: Bottom emptying devices for liquid products including vapour return		Where to refer in ADR/RID: Reference not supported	Applicable sub-sections and paragraphs: Not relevant
CEN consultants assessment dated 10.12.2008					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	General to Part 2	<p>6.8.2.2.3 of RID uses the term “self-operating ventilation valves”. It is unfortunate that a different term “auto vent valve” is used in this Standard for the same piece of equipment.</p> <p>Tank wagons in Britain use hardly any of the fittings described in the Standard, nor are they usually located in the positions shown. The current fittings would have to continue to be used in the current positions as they are compatible with the loading and discharge terminals and in some many cases are considered to be superior and safer than the fittings described. For example paragraph 5.1 c) of the standard prescribes a threaded connection at the end of each branch pipe, whereas quick acting or self-sealing dry break coupling arrangements are used here, particularly within the petroleum industry which facilitate a more efficient and leak free transfer system. Figure 3 prescribes the positioning and dimensioning of the equipment in the middle of the tank wagon. In Britain two T – pieces with branch pipes are fitted on bogie tank wagons (located towards each bogie) to fit in with the arrangements within terminals and to provide the required discharge capacity to meet service turnaround times and wagon utilisation requirements.</p>		<p>Alignment of terms supported.</p> <p>Technical issue, to be dealt with in CEN TC 256/ WG20</p>	<p>The STD's WG recommends that Parts 2 through 6 shall be restricted to the dimensional aspects of the service equipment of rail tank wagons and that the relationship with RID and the EU Framework-Directive stated in the standard are deleted. They would then no longer deal with RID requirements on service equipment and be applicable for non-dangerous contents as well.</p> <p>If so, these parts of the standards could possibly be merged.</p>
CH	Fig.1	Warum sind die Schraubkappen auf Bilder 1 & 2 nicht referenziert. Sie sind im RID unter 6.8.2.2.2 vorgeschrieben.	Why are the screw caps in Figures 1 & 2 not referenced? They are subject to RID 6.8.2.2.2.	Completion of the KEY to be considered.	To be considered for the further revision process.
CH	5.2 b) and e)	"Das innen liegende Bodenventil muss bodenbedienbar sein..." "Wenn das innen liegende Bodenventil bodenbedienbar ist,..." Diese Formulierung ist unglücklich!	The wording in the two subparagraphs is arbitrary: b) The ...valve shall bee) If the valve is	To be edited.	To be considered for the further revision process.
CH	5.5	Wo befinden sich die Erdungsplatten auf Bild 3?	Where are the earthing plates on Figure 3?	Amendment of the Figure suggested.	To be considered for the further revision process.
CH	10 and 11	Inhaltlich schwach!!!	Weak contents!	-/-	

prEN 12561-3		Railway applications - Tank wagons - Part 3: Bottom filling and emptying devices for gases liquefied under pressure		Where to refer in ADR/RID: Reference not supported	Applicable sub-sections and paragraphs: Not relevant
CEN consultants assessment dated 10.12.2008					
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	1	Der Anwendungsbereich sollte sich nach RID richten. Im RID spricht man von "verflüssigten Gasen", wobei 2 Kategorien definiert werden: unter hohem und unter geringem Druck verflüssigte Gase. Welche Gase sind in dieser Norm gemeint? Wenn beide Kategorien, dann sollte der Ausdruck "unter Druck" verschwinden. Warum hat man in dieser Norm nicht ebenfalls oben liegenden Öffnungen (z. B. Chlortanks) berücksichtigt?	The Scope should comply with RID, which specifies „liquefied gases“ in two categories - gases liquefied under high and low pressure -. Which gases are meant in the standard? If both categories are included, then the term "under pressure" should disappear. . Why do top openings have been considered in this standard (i.e. for chlorine tank wagons)?	Alignment with RID preferable. To be considered for the evolution of the standard series.	No longer relevant if general proposal is adopted
CH	4.1	Die Rohre des Gasphasensystems sollen wie diejenigen des Flüssigphasensystems DN 80 sein, aber die Kupplung muss eine DN 50 Nennweite aufweisen. Angeblich entspricht das der heutigen Praxis. So kann man Fehllanschlüsse vermeiden, aber es ist technisch betrachtet ungünstig. Schade, dass die Norm kein besseres System vorschlägt.	It is required the diameter of the gas phase as well as the liquid phase- pipe-work shall be of DN 80. However the couplings shall be of DN 50. It is said that this corresponds to the real situation to avoid wrong coupling. However, this is an unfortunate solution from a technical standpoint. It is a pity that the standard doesn't provide for a innovative solution.	May be considered for the evolution of the standard.	To be considered for the further revision process.
CH	5.3	Wie ist es möglich, dass es Unterschiede gibt zwischen diesem Text und dem Text des § 5.2 (a) des Teils 2 ? Diese Bemerkung gilt eigentlich nicht nur für (a)!!!	What is the reasoning for the differences between Clause 5.3 and the text of Clause 5.2 (a) in Part 2? This remark is not only valid for (a)!!	Consistent wording recommended.	No longer relevant if general proposal is adopted.

prEN 12561-4		Railway applications - Tank wagons - Part 4: Top devices for top emptying and filling of liquid products		Where to refer in ADR/RID: Reference not supported	Applicable sub-sections and paragraphs: Not relevant
CEN consultants assessment dated 10.12.2008					
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	Inhaltlich sehr schwach.	Very weak contents.	-/-	-/-

CH	4.1	Erster Satz nicht verständlich.	First sentence couldn't be understood.	To be edited.	No longer relevant if general proposal is adopted.
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prEN 12561-5	Railway applications - Tank wagons - Part 5: Top devices for bottom emptying and top filling of liquid products		Where to refer in ADR/RID: Reference not supported	Applicable sub-sections and paragraphs: Not relevant	
CEN consultants assessment dated 10.12.2008					
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	Inhaltlich noch schwächer als Teil 4.	Contents even weaker than Part 4.	-/-	-/-
CH	4.2	4.2 behandelt Mannlöcher. Man versteht nicht, wieso es in dieser Normreihe einen Teil 6 (nicht unterbreitet) für Mannlöcher gibt.	Clause 4.2 deals with manholes. It isn't understood why there is a Part 6 on manholes, in parallel.	Clause 4.2 is questioned and may be moved to Part 6	See general comments above.
CH	Figure 1	die Nummern der Legende wurden auf der Zeichnung nicht eingetragen. Vergessen?	The item numbers of the key have not been added to the drawing. Forgotten?	To be edited	To be considered for the further revision process.

prEN 12561-6	Railway applications - Tank wagons - Part 6: Manholes		Where to refer in ADR/RID: Reference not supported	Applicable sub-sections and paragraphs: Not relevant	
CEN consultants assessment dated 10.12.2008					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
		No comments.			See general comment above.

prEN 12561-7	Railway applications - Tank wagons - Part 7: Platforms and ladders		Where to refer in ADR/RID: no reference possible	Applicable sub-sections and paragraphs: Not relevant	
CEN consultants assessment dated 10.12.2008					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	General to Part 7	We agree with the CEN Consultant that there are no requirements in RID relating to the subject matter of these Standards and therefore they do not need to be discussed by the Standards		-/-	The STD'S WG is of the opinion that this part has no relationship with RID at all and that all references to RID and the Framework- Directive shall be deleted.

	Working Group.			
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prEN 12561-8	Railway applications - Tank wagons – Part 8: Heating connections	Where to refer in ADR/RID: no reference possible	Applicable sub-sections and paragraphs: Not relevant		
CEN consultants assessment dated 10.12.2008					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	General to Part 8	We agree with the CEN Consultant that there are no requirements in RID relating to the subject matter of these Standards and therefore they do not need to be discussed by the Standards Working Group.		-/-	The STD'S WG is of the opinion that this part has no relationship with RID at all and that all references to RID and the Framework- Directive shall be deleted.

3. Dispatch from CEN on 15.12.2008

prEN ISO 10156	Gases and gas mixtures - Determination of fire potential and oxidizing ability for the selection of cylinder valve outlets (ISO/DIS 10156:2008)	Where to refer in ADR/RID: 2.2.2.1.5	Applicable sub-sections and paragraphs: 2.2.2.1.5		
CEN consultants assessment dated 15.12.2008					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	General	This standard is used for classification in a part of the regulations where ADR/RID/ADN follows from the UN text.	Await the adoption of this standard by the UNSCoE-TDG in the 17th revised edition.	Agree.	The STD's WG takes it as given that the European Annex to this standard will neither include deviations nor additions and that ADR/RID will fully be harmonized with the UN Model Regulations in this point. It therefore will await the approval of ISO 10156 and will then discuss a revised reference text for the EN version.
UK	Foreword	The ISO Directives require that the Foreword contains a statement of significant technical changes; this is absent, although partially covered in the Introduction.	Add statement of significant technical changes. N.B. Section 5 is completely new.	Supported.	To be considered for the further revision process.
UK		The DIS is closed and there are many pages of comments and corrections from the member standards bodies.		Result to be awaited-	-/-
CH	General	... agree with CEN consultant		-/-	-/-

B. Standards at Stage 3: Submitted for Formal Voting

1. Dispatch from CEN on 4.9.2008

prEN 12807:2008	LPG equipment and accessories – Transportable refillable brazed steel cylinders for liquefied petroleum gas (LPG) – Design and construction		Where to refer in ADR/RID: 6.2.4	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4	
CEN consultants assessment dated 25 August 2008					
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	It must be clear that, in accordance with the recommendations of the CEN consultant, this standard is only for 6.2.3.1 and 6.2.3.6 and not for 6.2.3.9 (marking). Therefore the normative reference of EN 14894 must be excluded in the Table of 6.2.4.		A general agreement on how to deal uniformly with marking standards should be achieved.	Following the general recommendation (see comment on prEN ISO 13769) to include a normative clause on the compliance of marking clauses and provisions in any marking standard and in any standard including marking clauses referenced or to be referenced in ADR/RID, the STD's WG accept at this stage the NOTES included in prEN 12807 as acceptable. For the reference text in ADR/RID the Group supports the field of applicable sub-sections and paragraphs (6.2.3.1 and 6.2.3.4).
Decision of the STD's WG:		Accepted Refused Postponed	Comments: For future revisions the following text should be included in the standard as normative clause: "Stamp marking shall be in accordance with the requirements of ADR/RID and with EN 14894. The requirements of ADR/RID shall override conflicting requirements of this standard."		

3. Dispatch from CEN on 15.12.2008

prEN ISO 13769	Gas cylinders - Stamp marking (ISO 13769:2007)		Where to refer in ADR/RID: Reference refused	Applicable sub-sections and paragraphs: Not relevant	
CEN consultants assessment dated 15.12.2008					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	Fourth comment in the table at the end of	The non-conformity noted by the Consultant 'Manufacturers identification' should be 'manufacturer's mark registered with the competent authority' is non-conformity with the UN text in the original ISO. It is not the task of the EN annex to correct	None Suggest the change in the next revision by ISO.	Agree.	No comment.

	Consultant's assessment	what is only a minor error in the ISO text. Also, the non-conformity is not going to cause confusion and since all manufacturers know which mark should be applied.			
UK	Final comment in the table at the end of Consultant's assessment	The inclusion of "reassessed" here would be wrong. The point the standard writers are making is that the Pi mark applied during manufacture should go in position 27, but for reassessment, which is by definition done long after all manufacturing and certification marks have been applied there will be no room here because the marks are applied close together. Hence the Pi mark must be placed at position 22.	None	Persuaded!	No comment.
UK	Topic for discussion References to this standard in EN standards	It is proposed to change the EN standards so that they no longer rely only on EN ISO 13769, but require stamping in accordance with the regulations. ISO has resolved to deal with this by including a Note after the reference to ISO 13769 as follows. "NOTE Attention is drawn to requirements for marking in relevant regulations that might override the requirements given in this International standard." A proposal for text in EN's is shown in the next column. Because of the intention to continue to produce EN ISO standards, we cannot commit to regular updates as have CEN/TC 286, and therefore we have to accept that discrepancies between the regulations and the standard can arise.	"Stamp marking shall be in accordance with the requirements of the current version of ADR/RID and with EN ISO 13769:2009. The requirements of ADR/RID shall override conflicting requirements of this standard."	Agree to find a general agreement on how to deal uniformly with marking standards.	The STD's WG considers the wording of this clause as adequate and recommends strongly that this normative clause (adapted with respect to the standard number) is included in any marking standard and in any standard including marking clauses referenced or to be referenced in ADR/RID.
CH	General	It has been discussed several time that it is not necessary to have this standard revered in RID/ADR. Further more, the working group on "Period of validity of type approvals and transitional measures for standards" writes in Doc 2009/3: <i>"14. For the rows in the table containing EN 13110 to EN 13769 column (3) indicates that the standard meets the requirements of 6.2.3.9 Marking of refillable pressure receptacles. In the view of the working group, this reference to 6.2.3.9 should be removed. The regulations give specific instructions on marking and should be consulted. The standards are unlikely to remain in agreement with the regulations; for example, there is a pending proposal for the 16th revision of the UN Model Regulations for marking bundles of cylinders which will change the requirements."</i>		As above	The STD's WG assumes that the proposal submitted by ECMA in working paper ECE/TRANS/WP.15/AC.1/2009/3, item No. 13, to delete references to marking standards is adopted by the Joint Meeting.
CH	Annex Z	The stamp marking number 22 must be placed after the RID/ADR marking of the periodic test (no interference with standard RID/ADR marking). TPED Annex IV, Part 3, Module 1/3.2 says: "The inspection body must affix its identification number or have it affixed to		RID/ADR 6.2.2.7.5 (acc. to 6.2.3.9.1 also valid for non-UN cylinders) includes no requirement of the sequence with	Full compliance of the European Annex with the marking provisions of TPED should also be achieved. However, this aspect is outside the competences of the STD's WG.

		each product being periodically inspected immediately after the date of periodic inspection....”		“other marks” as long as they don’t conflict with the required marks. New TPED will regulate π-marking now in Article 13(6).	
D	Annex Z Key 8	It should be made clear that the “inspection stamp” is the “identity mark or stamp of the inspection body that is registered with the competent authority of the country authorizing the marking” (6.2.2.7.1 (d) RID/ADR).	Add this clarification from the regulation (6.2.2.7.1 (d)) in the NOTE 1.	To be edited.	The Group support alignment of terms for future revisions
Decision of the STD’s WG:		Accepted as a normative reference in standards Refused Postponed	Comments:		

prEN 15551	Railway applications – Railway rolling stock – Buffers		Where to refer in ADR/RID: 6.8.4, TE 22	Applicable sub-sections and paragraphs: 6.8.4, TE 22	
CEN consultants assessment dated 15.12.2008					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	General	We agree with the CEN Consultant’s comments on this Standard and its likely suitability for referencing in RID (however see comment below regarding L.2 d))		-/-	To be considered for future revisions.
UK	Annex L last paragraph of L.2 b)	Reference is made to L.2 d) in relation to additional tests, yet no L.2 d) exists in the Standard.		To be edited	To be considered for future revisions.
UK	CEN Consultant’s suggested addition to Foreword	It is suggested that it would be helpful to mention the elements of RID which the standard addresses. This could be done by an addition to the sentence “The standard has been submitted for reference into the RID.”	The standard has been submitted for reference into the RID in relation to crashworthy buffers for tank wagons.	-/-	To be considered for future revisions.
UK	CEN Consultant’s suggested addition to Clause 7	The note should be added in Clause 7 (not 9). The English of the second sentence of the second paragraph (penultimate sentence of the Note) is unclear and an alternative is given in the next column.	“This may lead to temporary non-compliances of EN 15551 with RID.”	-/-	To be considered for future revisions.

CH	Annex L	<p>In TE22 the minimum energy to be absorbed is at least 800kJ per end. In the standard in Annex L (in accordance with RID?) the total energy that can be absorbed is $\geq 400\text{kJ}$ or $\geq 250\text{ kJ}$. How is this comparable? Is it necessary to have this standard referenced in RID? Where should it be placed?</p>		<p>Annex L specifies energy absorption <u>per buffer</u> (not per end). I declared EN 15551 as candidate to be referenced under 6.8.4 RID.</p>	<p>The Group would support clarification that EN 15551 is only dealing with dual buffers.</p>
<p>Decision of the STD's WG:</p>		<p>Accepted as normative reference Refused Postponed</p>	<p>Comments: EN 15551 is considered as a tool to qualify buffers. To replace UIC leaflet 573, referenced in RID, TE22, in full, it would need to be complemented by a normative document on the design of rail wagon base structure.</p>		