



**Economic and Social
Council**

Distr.
GENERAL

ECE/TRANS/WP.15/AC.1/2009/31
12 June 2009

Original: ENGLISH

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

Bern, 8-11 September 2009 and
Geneva, 14-18 September 2009
Item 7 (b) of the provisional agenda

PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN

New proposals

Test Period for P200

Transmitted by the European Industrial Gases Association (EIGA)^{1,2}

Introduction

1. For very many years there has been a requirement to carry out a periodic inspection and test of pressure receptacles. The interval between these periodic inspection and tests was administered and enforced by National Authorities at periodicities usually established by those Authorities.

¹ 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)).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2009/31.

2. With the development of both harmonized standards and regulations the methods of the periodic inspection and test as well as the intervals between these tests have become harmonized. This has brought about significant benefits in terms of a simplified test regime across the areas where RID/ADR/ADN is applied.

3. As experience has developed over the life of pressure receptacles test periods have been extended through a number of carefully considered incremental steps. For example in a number of cases test periods have been extended from two years, to five years and eventually to ten years. At each incremental change, there has been a careful and considered review by all parties involved to ensure that any change is managed in such a way that all factors have been considered to ensure that safety has not been compromised.

4. As a result of these carefully reviewed and managed changes, all involved have been able to demonstrate no negative impact on the impressive safety record of pressure receptacles. EIGA is not aware that an increase in the test period has ever been revoked.

5. Over the past twenty years there have been a number of developments in the industrial gases industry such as the widespread use of cylinder valves that retain a minimum pressure in the cylinder and prevent backflow and hence contamination into the cylinder. As well, there has been the development of harmonized standards, incorporated into RID/ADR/ADN for the pre fill inspection of cylinders.

6. As test intervals for pressure receptacles have been increased as experience has been gained EIGA wishes to formally raise the subject of consideration of how the test interval for gases covered within Packaging Instruction of P200 of ADR could be further extended.

Proposal

7. As the Joint Meeting is aware, there has been an informal intersessional working group looking at the test period of cylinders containing liquefied petroleum gas. Whilst not directly part of EIGA's activity EIGA has been participating and supporting this work. In particular there have been a number of important technical points raised that EIGA and others would need to take into account on any discussions on the subject of increased test intervals for other gases of P200.

8. EIGA has had preliminary discussions with the European Cylinder Makers Association, ECMA, who are the major supplier of cylinders to EIGA member companies. They have raised a number of technical issues that would require review.

9. EIGA appreciates that any proposal to consider extending the test period of cylinders will raise interest from many areas.

10. At this stage, EIGA is not proposing which gases or packaging should be considered for an extension to their existing test period or detailed technical submissions such as closure life as it is felt this is best considered by an informal working group.

11. Recently, there has been the introduction of “UN” pressure receptacles into RID/ADR/ADN, and there is a link between P200 of the Model Regulations and P200 of RID/ADR/ADN. EIGA recognizes that if there was a difference in the test period between a UN cylinder and a non UN cylinder, this could cause confusion, and as well detract from the introduction of UN cylinders.

12. Consequently, EIGA wishes to formally raise with the Joint Meeting a request to either form a new informal working group to look at the subject of extending the test periods for gases in P200 or alternatively extend the scope of the existing informal working group.

Justification

13. The formation of a group to look at this subject in depth will allow all interested parties to contribute and ensure that a balanced and objective view is obtained on the matter and an agreed plan developed on how to proceed.

Safety

14. Any extended test regime has to have an equivalent level of safety as the existing test regime, which is in part the reason for this request to the Joint Meeting to enable as wide a review as possible.

Feasibility

This will be part of the review.

Enforceability

This will be part of the review.
