

## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

3 September 2010

#### Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Geneva, 13–17 September 2010

Item 3 of the provisional agenda

#### Standards

### **Consolidated comments by Members of the Joint Meeting on draft standards dispatched by CEN since the last session**

#### **Transmitted by the European Committee for Standardisation (CEN)**

1. Reference is made to document ECE/TRANS/WP.15/AC.1/2009/32, which informs about the progress made in the establishment of new and the revision of published EN and EN ISO standards referenced or intended to be referenced in the RID/ADR/ADN. It invites Members of the Joint meeting to comment on draft standards at enquiry and formal vote stage, provided on the dedicated CEN internet-site.

2. Since the last session of March 2010, four dispatches of six draft standards together with assessments by the CEN consultant were made available on the dedicated CEN website. All comments received are consolidated in this document which will be reviewed by the Joint Meeting Working Group on Standards (Std's WG) during the September 2010 session.

3. Applicability of burst pressure requirement for valve standards:

Document ECE/TRANS/WP.15/AC.1/2009/32 included background and reasoning for amendments of the table of RID/ADR 6.2.4.1 under "for closures". It is noted that comments were received which deny the compliance of EN 849:1996, EN 849:1996+A2:2001 EN ISO 10297:2006 with the burst pressure requirement in 6.2.1.3 and asking for a limitation of lifetime of type approvals and the exemption of relevant chapters 3.3 and 6.6 of these standards.

In parallel, it was proposed to indicate "6.2.3" as applicable requirement for all of the standards referred to in this table under "for closures".

4. Reference to EN ISO 13340: 2001:

It is recalled that the STD'S WG supported in principle a reference to this standard and announced a final recommendation after it would be provided with a copy of the latest draft (see INF.41 of the March 2010 session, paragraph 2.2). EN ISO 13340:2001 had already been discussed in March 2002 with the conclusion that this standard with its limited number of clauses was proposed to be a "supportive standard", not recommended for reference in RID/ADR.

It is considered inadequate so submit this standard to the Std's WG again at this point of time before it has been reviewed to account for the state of standards for comparable equipment and for compliance with RID/ADR after several revisions.

## Annex

### A. Standards at Stage 2: Submitted for Public Enquiry

Dispatched by CEN on 28.4.2010

prEN 13922		Tanks for transport of dangerous goods – Service equipment for tanks – Overfill prevention systems for liquid fuels	Where to refer in RID/ADR/ADN: No reference recommended	Applicable sub-sections and paragraphs: None	
Assessed by CEN consultant on 26.3.2010					
Summary of conclusions: <i>prEN 13922 can be promoted to the formal vote stage. A few improvements are recommended. It is not considered to be a candidate for reference in RID/ADR/ADN.</i>					
Proposed follow-up action: <i>No action required, as this standard is not related to RID/ADR/ADN-requirements.</i>					
<b>Comments from members of the Joint Meeting:</b>					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		Agree that this standard does not relate to the requirements of RID/ADR and should not be referenced		./.	

prEN ISO/DIS 11118		Gas cylinders - Non-refillable metallic gas cylinders - Specification and test methods (ISO/DIS 11118:2009)	Where to refer in RID/ADR/ADN: 6.2.4.1	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4	
Assessed by CEN consultant on 22.4.2010					
Summary of conclusions: <i>With respect to the concordance of the requirements on UN- pressure receptacles it is important to know that there are some non- compliances between prEN ISO 11118 and RID/ADR/ADN 2009, as amended and to become effective by 1.1.2011. These need to be removed. In addition, several deficiencies have been detected and need to be addressed for the formal vote version of the standard. The absence of a European Annex is questioned, given the fact that comparable EN ISO standards include European Annexes to take account of specific European practices and needs. A European Annex is proposed.</i>					

*Because of the number and significance of the shortcomings it is proposed to launch a second enquiry based on a new draft text. prEN ISO 11118 is considered to be a candidate to replace EN 12205:2001 in RID/ADR, once it has been accepted for reference by the Standards Working Group and has been approved.*

Proposed follow-up action:

*This standard needs to be discussed by the STD's WG for reference in RID/ADR 6.2.4.1, Table, under "for design and construction" and related to subsections 6.2.3.1 and 6.2.3.4.*

**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	The ISO and CEN Working Groups should respond to the recommendations of the CEN Consultant. ISO 11118 is already referenced in the UN Model Regulations and it may have been construed that this reference implies that at least some of the non-conformances with the Model Regulations are permissible for these particular receptacles. Nevertheless, the standard and the relevant regulations must either align or the regulations shall explicitly allow the non-conformances for the scope of the standard.		./.	
D	5.1.8	This clause which allows the filling of non-refillable cylinders with acetylene is not considered acceptable with regard to safety (Extent and costs of type testing, complexity and time consuming procedures, long ranging lifetime of porous masses). It is referred to the reasoning and outcome of discussion by the UN SCoE TDG in July 2006 (Doc. ST/SG/AC.10/C.3/2006/26)	ISO 11118 (and EN ISO 11118) shall not be referenced as applicable for acetylene cylinders.	Supported; See also WP's 16 and 46	
CH	Whole standard	We support the comments of the CEN consultant and its recommendations in the e-balloting template. As there are so many changes to be done, we will have to wait for the next stage to look at it again in detail.		./.	

Dispatched by CEN on 24.8.2010

prEN ISO 11372		Gas cylinders - Acetylene cylinders - Filling conditions and filling inspection (ISO/DIS 11372:2010)	Where to refer in RID/ADR/ADN: P200(11)	Applicable sub-sections and paragraphs: P200 (7), (10P)	
<p>Assessed by CEN consultant on 23.8.2010</p> <p>Summary of conclusions:  <i>prEN ISO 11372 can be promoted to the formal vote stage. Some improvements are recommended.</i>  <i>It is candidate for reference in RID/ADR.</i></p> <p>Proposed follow-up action:  <i>This standard needs to be discussed by the STD's WG as a replacement of EN 1801:1998, EN 12754:2001.in RID/ADR/ADN, subsection 4.1.4.1, P200(11).</i></p>					
<b>Comments from members of the Joint Meeting:</b>					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	Whole standard	We support the comments of the CEN consultant and its recommendations in the e-balloting template..		./.	
CH	4.2.1	Under clause 5.1 is a information concerning marking of solvent free acetylene cylinders. We believe that this information should be mentioned under clause 4.2.1		To be checked for the FV- text.	

### B. Standards at Stage 3: Submitted for Formal vote

Dispatched by CEN on 3.6.2010

FprEN ISO DIS 13341		Transportable gas cylinders – Fitting of valves to gas cylinders	Where to refer in RID/ADR/ADN: No reference recommended	Applicable sub-sections and paragraphs: None	
<p>Assessed by CEN consultant on 27.5.2010</p> <p>Summary of conclusions:  <i>FprEN ISO 13341 can be approved. A few editorial improvements are recommended.</i>  <i>It is not considered to be a candidate for reference in RID/ADR/ADN.</i>  <i>There is seen no need to have European modifications.</i></p> <p>Proposed follow-up action:  <i>No action required, as this standard is no candidate for reference in RID/ADR/ADN.</i></p>					

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		Agree that this standard is not a candidate for referencing in the regulations.			./.	
<b>Decision of the STD's WG:</b>		Accepted Refused Postponed	Comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
				Old edition	Between 1 January XXXX and 31 December XXXX	31 December XXX
				New edition	Until further notice	

Dispatched by CEN on 25.7.2010

<b>FprEN 14638-3</b>	<b>Transportable gas cylinders – Refillable welded receptacles of a capacity not exceeding 150 litres – Part 3: Welded carbon steel cylinders made to a design justified by experimental methods</b>	<b>Where to refer in RID/ADR/ADN: 6.2.4.1</b>	<b>Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4</b>
<p>Assessment of first final draft by CEN consultant on 6.6.2010</p> <p>Summary of conclusions:</p> <p><i>There are no non-compliances between FprEN 14638-3 and RID/ADR/ADN 2009, as amended and to become effective by 1.1.2011.</i></p> <p><i>Comments by the Standards Working Group and of my assessment of the second enquiry draft text of the standard - both considered as of editorial nature - have now – with the second Final draft text - been addressed adequately.</i></p> <p><i>One additional major editorial deficiency was detected which need to be corrected prior to printing (see Annex to this assessment).</i></p> <p><i>EN 14638-3 is proposed for reference in RID/ADR 6.2.4.1, Table, under “for design and construction related to subsections 6.2.3.1 and 6.2.3.4.</i></p> <p>Proposed follow-up action:</p> <p><i>This standard needs to be discussed by the STD's WG for reference in RID/ADR 6.2.4.1, Table, under “for design and construction” and related to subsections 6.2.3.1 and 6.2.3.4.</i></p>			

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	5.1	The sentence "It is recommended that an approximate calculation for the initial design is made." appears to conflict with RID/ADR "6.2.3.1.2 Whenever possible the wall thickness shall be determined by calculation, accompanied, if needed, by experimental stress analysis." Making the calculation only a recommendation seems not to meet the test of 'whenever possible'.			Alignment with regulations supported	
UK	9	In the penultimate sentence the reference to EN 14638-3 is incorrect.			To be corrected before publication or by a corrigendum	
UK	3	EN ISO 13769 is missing from the normative references			To be corrected before publication or by a corrigendum	
UK	General	This standard is suitable for referencing in the RID/ADR as proposed by the CEN Consultant and with attention to his recommendations.				
Decision of the STD's WG:		Accepted Refused Postponed	Comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
				Old edition	Between 1 January XXXC and 31 December XXXX	31 December XXX
				New edition	Until further notice	

Dispatched by CEN on 25.7.2010

<b>prEN 14894:2010</b>	<b>LPG equipment and accessories – Cylinder and drum marking</b>	<b>Where to refer in RID/ADR/ADN: 6.2.4.1</b>	<b>Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4</b>
Assessed by CEN consultant on 7.7.2010			
Summary of conclusions: <i>The text of this standard conforms to the provisions of RID/ADR as valid from 1.1.2011. It can be approved.</i>			

*A number of improvements are required prior to publication – see clause 5 and the Annex to this assessment, using the CEN electronic balloting commenting template.*

Proposed follow-up action:

*This standard needs to be discussed by the STD's WG as a normative reference for standards on the design of cylinders and drums for the transport of LPG.*

**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	8	This is a European standard, so all new cylinders in the EEA (i.e. all countries publishing CEN standards) will be required to carry the TPED Conformity ( $\pi$ ) mark. This is a certification mark and in our opinion should appear as the first item in table 3, as shown in TC 23's standard EN ISO 13769.	Transfer the TPED conformity mark entry to the first line of table 3 clause 7 so that the $\pi$ mark appears in the place of the UN mark	Supported.		
UK	General	Comments of the CEN Consultant supported, particularly the mention of grouping the marks on three lines – top, middle and bottom. This standard should not be referenced in RID/ADR.		./.		
CH	8	Comment to the CEN consultant: In our opinion it is correct to give the whole sample of the marking for the last periodic inspection, But we would prefer to changes the text in column 2 t. "marking of the last periodic inspection"		./.		
<b>Decision of the STD's WG:</b>		Accepted Refused Postponed	Comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
				Old edition	Between 1 January XXXC and 31 December XXXX	31 December XXX
				New edition	Until further notice	