Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

13 March 2012

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods
Bern, 19–23 March 2012
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.1/2012/6, 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 the compliance of draft standards at enquiry and formal vote stage with regulations of RID/ADR/ADN.
- 2. Since the last session of September 2012, nine draft standards and assessments by the CEN consultant were made available on the dedicated CEN webpage. All standards have been dispatched in time (8 weeks before the meeting of the Working Group on Standards) as agreed in the revised cooperation procedures between Joint Meeting and CEN (ECE/TRANS/WP.15/AC.1/100/Add.3).
- Dispatch 2 includes standards in addition to those which are included in ECE/TRANS/WP.15/AC.1/2011/37. 9 March 2012 was set as deadline for comments.
- 3. This document informs about the comments received and is intended to be discussed by the Working Group on Standards.
- 4. It is pointed out that the Working Group on Standards is expected to discuss, in addition working paper
 - ECE/TRANS/WP.15/AC.1/2012/7 References to ISO standards for UN pressure receptacles Section 6.2.2, submitted by ISO
 - and may be involved in the discussion of the following working papers:
 - ECE/TRANS/WP.15/AC.1/2012/3 Application of standards EN 14432 and EN 14433 listed in 6.8.2.6, submitted by Germany
 - ECE/TRANS/WP.15/AC.1/2012/**18** Questions pending from the fiftieth session of the RID Committee of Experts (Malmö, 21-25 November 2011), submitted by the Secretariat of OTIF, items 14-18.
- 5. The Working group will further need to deal with
 - The status of standards prepared to be published which have preliminary be adopted for reference and whose publication year is put in square brackets in the



amendments of RID/ADR 2013. This relates to standards EN 12493:2008+A1, EN 13082:2008+A1 and EN 1440:2008+A1.

- $-\,$ The consistency of applicable subsections and paragraphs declared as applicable for standards on closures in the table of 6.2.4.1 and for tanks in the table of 6.8.2.6.1 RID/ADR.
- The observation that the reference to EN 50015 in 9.2.2.5.1(a) Footnote is outdated and should be replaced.

A. Standards at Step 2: Submitted for Public Enquiry

W1 200120 0.0.2.0.1		prEN 14129 rev WI 286128	LPG Equipment and accessories - Pressure relief valves for LPG tanks	Where to refer in RID/ADR: 6.8.2.6.1	Applicable sub-sections and paragraphs: 6.8.2.1.1 and 6.8.3.2.9
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Dispatched on 5 January 2012 and on 26 January 2012 (Dispatch 1).

Assessment, dated 6.1.2012, dispatched on 26 January 2012 (Dispatch 1).

Summary of conclusions:

prEN 14129 rev can be promoted to the FV stage. There are no clauses in the standard that contradict to the limited number of provisions on pressure relief valves. There are no normative standards which contradict RID/ADR provisions either.

Major amendments and improvements are required and recommended in detail as annexed to this assessment..

Proposed follow-up action:

prEN 14129 needs to be discussed by the Std's WG as a possible candidate for reference in RID/ADR 6.8.2.6.1 indicating subsections 6.8.2.1.1 and 6.8.3.2.8 as applicable regulations.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH 1	General	We agree with the comments of the CEN consultant but we do not see a need to mention this standard in RID/ADR			
UK 1		The references quoted above should be from Chapter 6.8?	Where to refer: 6.8.2.6.1 Applicable paragraph 6.8.3.2.9	Agree. However, 6.8.2.1.1 is also applicable.	
UK 2	3.13	The device defined consists of a manifold and valve for changing from one PRV to another: it would be better if the device name was more descriptive.	Use "changeover manifold"	To be considered at TC level. Not related to compliance with RID/ADR.	

prEN 14427 rev	LPG equipment and accessories - Transportable	Where to refer in RID/ADR:	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4
WI 286120	refillable composite cylinders for LPG - Design and construction	6.2.4.1	0.2.3.1 and 0.2.3.4

Latest draft dispatched on 26 January 2012 (Dispatch 1).

Assessment, dated 23.1.2012, dispatched on 26 January 2012 (Dispatch 1).

Summary of conclusions:

There are <u>no</u> clauses and no normative references contradicting related provisions of RID/ADR. It can be promoted to the FV stage. Further alignment with RID/ADR is required and a series of deficiencies need to be removed as outlined in the Annex to this assessment. This includes the comments by the STD's WG at its meeting in September 2011.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as an amendment of the existing references to EN 14427:2004 and EN 14427:2004+A1:2005 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:

Note: This standard was already discussed in September 2011. See INF. 38rev.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH 1	Title	The German title is fully wrapped (vollumwickelt) as in the scope. In the French and English this is still missing.			
UK 1	2	EN 1964-1 and EN 1964-2 have been withdrawn and replaced by EN ISO 9809-1, and -3 (for part 1) and 9089-2 (for part 2)	Revise references	To be considered at TC level. Not related to compliance with RID/ADR.	
UK 2	3.1	Align the definition of LPG with RID/ADR 2013			
CH 2	3.1	3.1 should be in accordance with RID/ADR			
UK 3	4.1.1	Notes are intended to assist the understanding or use of	Delete the note	To be considered	

CH 3	5.1	the standard. The note about three piece cylinders does neither of these things and has no relevance to this standard. "this clause describes some ? of the tests to be		at TC level. Not related to compliance with RID/ADR.	
UK 4	5.1 Note 2	conducted". Are there tests described in another place? There are several instructions to compare damage from the tests to the rejection criteria established in accordance with EN 1439. This note is the only instruction for the manufacturer to establish the rejection limits and record them in the documentation of the cylinder	Make the instruction of Note 2 normative text.		
UK 5	5.2.9.3.1 and 5.2.10.1	Since both cylinders are assessed against the rejection criteria it is necessary to visually inspect both	Amend the sentence immediately following Figure 4. And the second sentence after Figure 5	ong er	
UK 6	5.2.16.1	Change the references to the withdrawn standards EN 629-1, -2	Replace with EN ISO 11363-1:2010 and EN ISO 11363-2:2010		
CH 4	7.3	Is 7.3 really essential for full wrapped cylinders?			
UK 7	A1	As in 5.1, Note 2 shall be made normative			
UK 8	Bibliograp hy	[2], [3] EN 629-1, -2 have been withdrawn and replaced	Replace with EN ISO 11363-1:2010 and EN ISO 11363-2:2010		
CH 5		We also agree with the comments of UK and the editorial comments of September 2011			

PrEN 14025 rev WI 296049 Tanks for the transport of dangerous goods - Met pressure tanks - Design and construction	Where to refer in RID/ADR: 6.8.2.6.1	Applicable sub-sections and paragraphs: 6.8.2.1 and 6.8.3.1
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Dispatched on 5 January 2012 and on 26 January 2012 (Dispatch 1).

Assessment (rev1), dated 10.2.2012, dispatched on 23 February 2012 (Dispatch 1).

Summary of conclusions:

There are no clauses and no normative references contradicting related provisions of RID/ADR. It can be promoted to the FV stage. Further alignment with RID/ADR is required and editorial improvements recommended as outlined in the Annex to this assessment.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG for reference in RID/ADR subsection 6.8.2.6.1 and related to the requirements of subsections 6.8.2.1 and 6.8.3.1 as an amendment of the existing references.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH 1	General	In general we agree with the comments of the CEN consultant.			
CH 2		The chapters which, in accordance with the CEN assessment, are not addressed by this standard should be mentioned in column 3 of table 6.8.2.4 RID/ADR			
CH 3	4.1/ 4.2	We do not understand the meaning of "see also". Does it mean it is compulsory to apply the requirements of 6.2 or does it mean you can apply them if you like but EN 13445-2 is preferred? That's why we fully support the point .2.1.1 and 2.1.2.of the CEN consultant's report. We would prefer mentioning that the requirements of chapter 6.8 prevail in all cases. Or does the note of the scope already declared by the note of the scope?			

UK 1	5.2	Mixing references to RID/ADR and Figures of this standard is initially confusing; the different sources should be identified	" see Figure 1a) of this standard"; " see Figure 1b) of this standard";	To be considered at TC level. Not related to compliance with	
UK 2	5.5 Note	The reference of 10.6.3 has lost its first 6.	" RID/ADR 6.10.6.3"	RID/ADR.	
UK 3	7.2.4.1 Note	Verb missing in second sentence	" that these are used exclusively"		
UK 4	General	No deviation from RID/ADR was detected.			

prEN 14564 rev	Tanks for transport of dangerous goods -	Where to refer in RID/ADR:	Applicable sub-sections and paragraphs:
WI 296051	Terminology	Reference questioned	1,2,1

Dispatched on 5 January 2012 and on 26 January 2012 (Dispatch 1).

Assessment, dated 10.1.2012 dispatched on 26 January 2012 (Dispatch 1).

Summary of conclusions:

prEN 14564 rev can be promoted to the FV stage. There are no clauses in the standard that contradict to the limited number of provisions on pressure relief valves. There are no normative standards which contradict RID/ADR provisions either.

Major amendments and improvements are required and recommended in detail as annexed to this assessment.

Proposed follow-up action:

prEN 14564 needs to be discussed by the STD's WG as a candidate for reference in design, construction and inspection standards referenced in RID/ADR.

Furthermore it is suggested that the Working Group on Definitions established by the Joint Meeting is informed about the progress made with this standard. TC 296 may also decide to amend or adapt or complement the existing terms and definitions on tanks to align them with those in this standard.

Comme	nts from mei	mbers of the Joint Meeting:			
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH 1	General	We do not support to reference this standard in RID/ADR and therefore abstain from a judgment.			
D 1	3.10	In this standard only the pure elliptical shape should be defined. Special shapes (deviations) should be defined in the relevant single tank standards (e.g. EN 13094), because EN 14564 is relevant for all tank standards in principle.	Define the pure elliptical shape only	To be considered at TC level. Not related to compliance with RID/ADR.	
UK 1	All	This standard is not judged to be suitable for referencing in the RID/ADR, so a detailed scrutiny has not been carried out.			
UK 2	Foreword and Scope	The phrase "technical code" is used to mean the technical publications concerning tanks for the transport of dangerous goods. Technical code has a more specific meaning in Chapter 6.8 of RID/ADR and another phrase should be found. Furthermore, 3.21 defines technical code to means a specific standard.	Use "technical publications"		
UK 3	All	The comments and recommendations of the CEN Consultant are supported.			

WI 2861//3	PG equipment and accessories - Transportable Liquefied Petroleum Gas (LPG) welded steel essure drums with a capacity between 150 litres and 1 000 litres	Where to refer in RID/ADR: 6.2.4.1	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4.
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Dispatched on 23 January 2012 (Dispatch 2).

Assessment, dated 15.2.2012, dispatched on 5 March 2012 (Dispatch 2).

Summary of conclusions:

There are several RID/ADR provisions which are not or not adequately addressed as well as internal deficiencies of technical and editorial nature. Details and suggested amendments are added in the Annex to this assessment.

However, none of these issues are seen as contradictions to the relevant RID/ADR provisions. None of the normative references are in conflict with the related RID/ADR provisions.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as an amendment of the existing references to EN 14893:2006 and EN 14893:2006+AC:2007 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.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH 1	Title	What is the meaning in the English title of "Complementary element"?		To be considered at TC level. Not related to compliance with RID/ADR.	
UK 1	All	This draft has been reviewed on the basis that the deletions and additions marked are the only deviations from the 2006 version of this standard already referenced in RID/ADR			
UK 2	3.1	Align the definition of LPG with the RID/ADR 2013	Insert "liquefied" as		

			fourth word	
CH 2	3.1	Align with RID/ADR		
UK 3	All	The changes do not affect the standard's suitability for referencing in RID/ADR		
CH 3	8	The tests required by RID/ADR 6.2.1.5 are not fully enlisted.		
CH 4	11	Add the standard sentence about marking according to RID/ADR. EN 14894 only cannot be accepted.		
CH 5		On the other points we agree with the comments of the CEN consultant.		

B. Standards at Step 3: Submitted for Formal vote

ĺ	FprEN 13110	LPG equipment and accessories – Transportable	Where to refer in RID/ADR/ADN:	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4
Г	WII 206112	refillable welded aluminium cylinders for liquefied		0.2.3.1 and 0.2.3.4
	WI 286112	petroleum gas - Design and construction	6.2.4.1	

Issue 2011-09 dispatched on 5 January 2012 (Dispatch 1). Issue January 2012 dispatched on 23 January 2012 (Dispatch 2).

Assessment of issue January 2012, dated 23.2.2012 dispatched on 23 February 2012 (Dispatch 2).

Summary of conclusions (of latest assessment):

FprEN 13110, issue January 2012 can be approved. No further amendments or improvements are recommended.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as a replacement of EN 13110:2002 in RID/ADR, subsection 6.2.4.1, Table, under "for design and construction" and indicating RID/ADR subsections 6.2.3.1 and 6.2.3.4 as applicable requirements.

Transition regulation for earlier issues of the standard:

Following the reasoning for transition regulations as adopted by the Joint Meeting (see ECE-TRANS-WP15-AC1-2009-03) a transition period of two years for the withdrawal of type approvals shall only be applied if the revised/amended version of a standard "leads to full compliance with the latest applicable version of RID/ADR" and/or includes "important safety benefits".

The nature of amendments of the revised edition doesn't cope with these criteria. A restrictive transition regulation is not required, therefore. Type approvals based on the previous issue will then expire after 10 years following the general rule of RID/ADR 1.8.7.2.4.

Comme	nts from me	mbers of the Joint Meeting:			
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK 1	3.1.1	The definition needs "liquefied" inserting; "low pressure liquefied gas" is defined in RID/ADR 2.2.2.1, "low pressure gas" has no defined meaning.	Correct to "low pressure liquefied gas " to comply with the 2013 RID/ADR definition		
CH 1	3.1		Definition according to RID/ADR		
UK 2	3.1 and 7.12.2.2	The CEN Consultant's latest assessment dated 2011-10-16 seems to be based on an earlier version of the standard than the one circulated.	3.1 to be corrected as above and 7.12.2.2 is now in two sentences as requested.	Latest draft has been assessed on 2012-02-23.	
CH 2	7	For the initial tests the check of the neck thread is missing.			
UK 3	9.7.1 Fig 12	What is "the alternative burst test" referred to in the Note? Is this the alternative to mechanical tests specified in 9.7.3.4? If so, where is the requirement to have a water capacity < 6.5 litres in 9.7.3.4?	Clarify and align the note and 9.7.3.4	To be considered at TC level. Not related to compliance with RID/ADR.	
CH 2	9.7.1	Note in 7.1 should read "be subjected to a the alternative burst test"			
CH 3	9.7.3.4	9.7.3.4 should have the same text as the note in 9.7.1.			
UK 4	All	This standard can be supported for reference in RID/ADR as recommended in this latest assessment.			

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
			For EN 13110:2002	Before 1 July 2015	31 December 2016
			For EN 13110:[2012]	Until further notice	

FprEN 12252:2011 2nd FV submission WI 286134 LPG equipment and accessories – Equipping of LPG road tankers	Where to refer in RID/ADR/ADN: 6.8.2.6.1	Applicable sub-sections and paragraphs: 6.8.3.2
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Dispatched on 23January 2012 (Dispatch 2).

Assessment, dated 14.10.2012, dispatched on 23 February 2012 (Dispatch 2).

Summary of conclusions:

This second draft of FprEN 12252:2011 is supported to be approved. There are no clauses which contradict ADR requirements.

Several issues are recommended to be considered for the next full revision of the standard and to be added to the work program of CEN/TC 286.

A number of improvements are required for the preparation of the text to be published.

Proposed follow-up action:

This revised version of EN 12252 needs to be discussed by the STD's WG as a replacement of the exiting reference in ADR, subsection 6.8.2.6.1 (table) with 6.8.3.2 as applicable subsections and paragraphs.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
D 1	General		Replace the term "road tanker" by the ADR term fixed tank (tank vehicle), demountable tank		

CH 1		The assessment is not fort he received version of the standard.			
UK 1	3.1	The definition needs "liquefied" inserting; "low pressure liquefied gas" is defined in RID/ADR 2.2.2.1, "low pressure gas" has no defined meaning.	Correct to "low pressure liquefied gas " to comply with the 2013 RID/ADR definition		
UK 2	3.9	The hydrostatic relief valve (or thermostatic relief valve) has an identical definition to the "thermal expansion valve" defined in prEN 14129 clause 3.2. It is called a thermal expansion valve in Table 1 of this standard.	Standardise terminology or, if these valves are different, define them differently	To be considered at TC level. Not related to compliance with RID/ADR.	
UK 3	3.17	A liquid level gauge is an instrument, not a control device, it indicates level, it does not control level.	Delete "control"		
NL 1	6.1.3.1	For road tankers the second closure is prescribed to be positioned at the end of each pipe (see 6.8.2.2.2 for "B" ADR)			
D 2	10	Inspection and Testing This clause should not be mentioned as reference in ADR because testing and inspection is covered by the EN 12972. EN 12252 is not a testing and inspection standard and overlapping contents should be avoided.			
CH 2	10	Inspection and testing: This subject is covered by EN 12972 which is not mentioned in close 2 (normative references)			
UK 4	10.3	The separate leakproofness testing of compartments is not mentioned, or compartmented tanks should be excluded from the scope of the standard.	Add "The leakproofness test shall be carried out separately on each		

				_			
				compartment of			
				compartmented			
				tanks."			
CH 3	10.3			10.3 should read			
				".shall undergo as a			
				completed assembly"			
				and the execution			
				should be in			
				accordance with EN			
				12972.			
NL	11.1.2	supply" will can have the Almost all t	r why tank vehicles for "customers need to have an "interlock" while others e choice of four safety systems in 11.1.3. anks are used to supply "Customers" this e persons taking 100 litre to large epots taking a whole tank load.	Delete 11.1.2 and renumber 11.1.3 accordingly.			
UK 5	Annex A	The express whereas AD cannot acco	ion for Q has coefficient of 44 640 PR 6.7.3.8.1.1 has a coefficient of 12.4. I unt for this in the use of different units.	Alignment or an explanation requested			
UK 6	Bibliograp hy	[9] PED is r	not mentioned in the standard	Delete	To be considered at TC level. Not related to compliance with RID/ADR.		
UK 7		in the ADR.	d is a step forward and can be referenced A rewrite to combine it with EN 12493 is soon as possible.				
Decision STD's W		Accepted Refused Postponed	Comments	Proposed transition regulation	Applicable for nev approvals or for re	w type newals	Latest date for withdrawal of existing type approvals
				For EN 12252:2000	Between 1 January and 31 December		31 December 2012
				For EN 12252:2005 + A1:2008	Between 1 January and 31 December	y 2005 2010	31 December 2014
				For EN 12252:[2012]	Until further no	tice	

FprEN 15202 LPG equipment and accessor operational dimensions for LPG outlet and associated equipme	G cylinder valve RID/ADR/ADN:	Applicable sub-sections and paragraphs: None
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Dispatched on 23 January 2012 (Dispatch 2).

Assessment, dated 15.10.2011, dispatched on 23 February 2012 (Dispatch 2). Summary of conclusions:

FprEN 15202 can be approved. One editorial amendment is required.

It is not considered to be a candidate for reference in RID/ADR.

Proposed follow-up action:

No action required. This standard needs is not a candidate for reference in RID/ADR/ADN.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK 1	All	This standard shall not be referenced in the RID/ADR: it does not relate to any essential requirements in RID/ADR. Furthermore, being mandatory, it would prohibit transport of LPG cylinders using different valve outlets, such as cylinders carrying aerosol propellant or analytical grade propane.			
CH 1		We agree with the comments of the CEN consultant No reference in RID/ADR			
Decision of the STD's WG:		Accepted Refused Postponed			

C. **Standards at Step 4: Published standards**

WI 0233	_	Transportable gas cylinders – Inspection and maintenance of cylinder valves (ISO 22434:2006)	Where to refer in RID/ADR/ADN: 6.2.4.2	Applicable sub-sections and paragraphs: 6.2.3.5
TOO		4 1: . 1 1 00 T 0010 (D: . 1 0)		

ISO- text and European Annex dispatched on 23 January 2012 (Dispatch 2).

Assessment, dated 1.12.2012 dispatched on 23 January 2012 (Dispatch 2).
Summary of conclusions:

FprEN 22434 can be approved.

Two paragraphs proposed to be added to the European foreword together with a European Bibliography.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG for reference in the table in RID/ADR subsection 6.2.4.2 as a replacement of the existing reference to EN 14876:2007.

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 1	All	No comments: the conclusions and recommendation of the CEN Consultant are supported.				
CH 1	General	In the assessment of the CEN consultant it is mentioned that this standard will replace EN14189:2003, but this is not mentioned in the standard itself!?				
CH 2	2	In close 2 it is stated that the listed standards are indispensable for the application of this standard. Therefore it can only be used for cylinders and valves built in accordance with the listed ISO standards. For this reason EN ISO22434 should not be listed in 6.2.4.2 of RID/ADR.				
Decision of the STD's WG:		Accepted Refused Postponed	Comments	Proposed transition regulation	Application authorized	
				For EN 14876:2007	To be deleted without transition period	
				For EN ISO 22434:[2012]	Uı	Until further notice

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