

---

**Economic Commission for Europe****Inland Transport Committee****Working Party on the Transport of Dangerous Goods****12 March 2013****Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods**

Bern, 18–22 March 2013

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.1/2013/10, 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, standards at enquiry and formal vote stage as well as one published standard and related assessments by the CEN Consultant were made available on the dedicated CEN webpage. Some of them were not yet included in ECE/TRANS/WP.15/AC.1/2013/10 because they became available only after the deadline for submission of working papers for the Joint Meeting.
3. This document informs about the comments received till the 8th of March which was set as the deadline for comments. It is intended to be used as a basis for the discussion by the Working Group on Standards (STD's WG).
4. CEN is aware of the agreement on the 8 weeks time tolerance between the dispatch of documents and the working group discussion. As far as no agreement on these late documents can be achieved they will be resubmitted for the September session.

In line with steps 2 and 3 of the Procedure for adoption of EN Standards in RID/ADR/ADN (see ECE/TRANS/WP.15/AC.1/122/Add.2) these comments shall be limited to the compliance of the standards with RID/ADR/ADN. Other comments are included for completeness. Technical and editorial comments will not be discussed. It is required that these comments are introduced by the Members via their national standardization bodies into the CEN approval and revision processes.

2 A. Standards at Step 2: Submitted for Public Enquiry

Dispatch 2

[English only]

prEN ISO 11623 rev	Transportable gas cylinders — Periodic inspection and testing of composite gas cylinders	Where to refer in RID/ADR: 6.2.4.2	Applicable sub-sections and paragraphs: 6.2.1.6 and 6.2.3.5		
WI 023150					
<p>Assessment by CEN consultant dated 1.3.2013 (Dispatch 2).            Summary of conclusions:  <i>There are no clauses contradicting to RID/ADR 2013. It covers the provisions of RID/ADR 6.2.3.5 in full. The normative references are also not conflicting with RID/ADR 2013. It can be promoted to the FV stage.</i>  <i>Generally, and in the absence of European modifications, it's questioned, whether an EN version is required for the purpose of a reference standard for non-UN pressure receptacles.</i></p> <p>Follow-up action by the Joint Meetings STD's WG:  <i>This standard needs to be discussed by the STD's WG for reference in RID/ADR subsection 6.2.4.2, table on the periodic inspection and test of non-UN pressure receptacles.</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
UK1	3.17	The use of the word 'authorized' is a legal term and is misleading because it suggests the involvement of the competent authority.	Replace 'authorized' with 'possible' or 'permissible'	To be discussed by WG STD's.	
prEN 16509	Transportable gas cylinders - Non-refillable, small transportable, steel cylinders of capacities up to and including 120ml containing compressed or liquefied gases (compact cylinders) - Design, construction, filling and testing	Where to refer in RID/ADR: 6.2.6.4	Applicable sub-sections and paragraphs: 6.2.6		
WI 023165					
<p>Assessment by CEN consultant dated 26.2.2013 (Dispatch 2).            Summary of conclusions:  <i>In some essential point the standard is non-compliant and contradicting to provisions of RID/ADR on gas cartridges which is taken as the most appropriate category of pressure receptacle. Alignment with these regulations is required prior to a promotion to the FV stage. This may include amendments of RID/ADR with respect to the requirements on gas cartridges. The marking provisions of Directive 2010/35/EU are not adequately addressed.</i></p> <p>Follow-up action by the Joint Meetings STD's WG:  <i>This standard needs to be discussed by the STD's WG as a candidate for reference in RID/ADR 6.2.6.4 and declared compliant with the requirements of RID/ADR Section 6.2.6.</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
UK1	1	The limitation to 120 ml suggests the authors wish to take advantage of the limited quantity provisions of ADR Chapter 3.4. This will not be available when oxidizing gases are filled		For consideration at TC level.	
UK2	4 and 2	EN ISO 11114 has four parts but only parts 1 & 2 are relevant.	Specify EN ISO 11114-1 and 11114-2 in clauses 2 & 4	To be considered at TC level.	
UK3	All	The most appropriate part of the regulations for these compact cylinders would seem to be 6.2.6, but ADR (not UNMR) limits gas cartridges to 13.2 bar at 50 degC. Such a low pressure is not suitable for CO <sub>2</sub> or N <sub>2</sub> O which a specifically mentioned in the standard. If these are treated as non refillable cylinders, the standard does not fulfil all the requirements, especially marking.	These cylinders are safe and a limitation to 13.2 bar is appropriate for aerosols and butane cartridges, but should not apply to these cylinders. ADR should align with the UN and remove the 13.2 bar restriction.	To be discussed by WG STD's. For consideration by JM aimed at aligning RID/ADR with UN Model Regulations.	
D1	Complete standard	The standard was written to cover type testing as part of type approval according to RID/ADR even if this information is completely missing in the foreword of the standard. Such compact cylinders either are not covered by a standard referenced in RID/ADR or the current designs will not meet such a standard. Because without meeting a standard referenced in RID/ADR the only way to issue a type approval is a national recognised technical code according to 6.2.5 RID/ADR which should be avoided by issuing a standard like EN 16509. But this standard has to be in-line with the requirements of 6.2 RID/ADR which is not the case for the document submitted for enquiry. For further information see attached document. Therefore Germany votes negative on the draft standard.*)	To be discussed at the next CEN/TC 23 Plenary Meeting in April 2013 in Berlin.	To be considered at TC level.	

\*) The German experts as already explained several times during the meetings of CEN/TC 23/SC1 WG5 are of the opinion that for every new receptacle which is not already covered by transport regulations, an application to UN is necessary first or at least in parallel. To publish a standard which is needed for but cannot be used under current transport regulations is not a good idea at all because it might be that to meet transport regulations it soon has to be revised.

4

The application process should start at UN level because compact cylinders are a new kind of receptacle for gases and should be multimodal. Even in European transportation there is also transportation by sea (e.g. to islands of the coast or by ferry in the Baltic Sea or Mediterranean Sea). Furthermore it is possible that the consignor of such compact cylinders will require express service and will send it by air. Such an application in our opinion should be submitted by either ECMA or EIGA or by both.

For the implementation of a new receptacle in transport regulations the existing definitions have to be completed or amended. All already existing requirements and standards in chapter 6.2 of UN Orange Book have to be checked to decide which ones already can be met by those small high pressure receptacles. All requirements, which are not relevant to compact cylinders have to be changed/adapted and if necessary additional requirements have to be added before a respective standard can be referenced.

It is understandable that the requirements for small receptacles UN 2037 based on the pressure limit of 12,5 bar (UN Orange Book) or 13,2 bar (RID/ADR) are not applicable. So it is necessary to get clear definitions to avoid confusion between both of these types of small receptacles.

It has to be discussed if it is possible to classify all small pressure receptacles as UN 2037 giving different requirements for small low and high pressure receptacles. Another option could be to differentiate between low pressure receptacles, small (UN 2037) and high pressure receptacles, small (new UN Number with different requirements).

According to 3.4 of UN Orange Book only small pressure receptacles which meet the relevant requirements of 6.2.5.1 and 6.2.6.1 to 6.2.6.3 are at the moment allowed to be transported. Existing designs and designs according to the proposed new standard do not comply with these requirements.

Finally there is the question, whether such compact cylinders only have importance for industrial gases or also for LPG.

prEN 13953 rev	LPG equipment and accessories - Pressure relief valves for transportable refillable cylinders for Liquefied Petroleum Gas (LPG)		Where to refer in RID/ADR: Reference questioned	Applicable sub-sections and paragraphs: None	
WI 286142					
Assessment by CEN consultant dated 8.2.2013 (Dispatch 2). Summary of conclusions: <i>prEN 13953 rev can be promoted to the FV stage. It is not considered a candidate for reference in RID/ADR. A few editorial amendments are recommended.</i> Follow-up action by the Joint Meetings STD's WG: <i>No action required as this standard is not considered a candidate for reference in RID/ADR..</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
UK1	All	This standard meets the requirements of 6.2.1.1, 6.2.1.2, 6.2.1.3.1 and the second sentence of 6.2.1.3.4 only. Is this enough to justify its place in 6.2.4? The existing version is not referenced.	Suggest this is a standard to be referenced by others e.g. ENs 1442, 13153	To be discussed by WG STD's.	
UK2	All	<b>On the other hand</b> , this is a 'demountable accessory having a direct safety function' which therefore may be subject to separate conformity assessment as specified in 6.2.3.6.1	Reference this standard! To be decided by the SWG		

UK3	All	This standard needs the services of an editor – but this is not the job of the Joint Meeting SWG.		Not related to compliance with RID/ADR.	
D1	Foreword	Because there is no requirement in RID/ADR to use a PRV for LPG and therefore there are no requirements on PRV's (and RPD's in general) this standard is no candidate to be referenced in RID/ADR.	Delete information on submission for reference in RID/ADR including the associated Note.	General legal issue to be discussed by WG STD's and possibly brought to the attention of the JM.	
D2	10	Because there is no requirement in RID/ADR (and therefore also TPED) to use a PRV for LPG and therefore there are no requirements on PRV's (and RPD's in general) there is no possibility to carry out a type approval for PRV's.	Delete the Note.		
D3	Bibliography	If it will be agreed that PRV's cannot be type approved under TPED (and RID/ADR) these Directives have to be deleted.	To be deleted.		

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

Dispatch 2

<b>FprEN 12493</b>	<b>LPG equipment and accessories - Welded steel pressure vessels for LPG road tankers - Design and manufacture</b>		<b>Where to refer in RID/ADR/ADN: 6.8.2.6.1</b>	<b>Applicable sub-sections and paragraphs: 6.8.2.1, 6.8.3.1, 6.8.5.1 – 6.8.5.3</b>	
WI 286151					
Assessed by CEN Consultant on 6.11.2012 (Dispatch 2)					
Summary of conclusions: <i>Except for Annex C the new draft of this standard is now compliant with ADR and can be approved. A few additional amendments are recommended, as indicated in the template annexed to this assessment. It is emphasized that these amendments are considered as editorial..</i>					
Follow-up action by the Joint Meetings STD's WG: <i>This revision of EN 12493 needs to be discussed by the STD's WG as an addition to the exiting reference in ADR, subsection 6.8.2.6.1.</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
UK1	8.5.2.3	I do not understand what is meant by “the degree of forming ... does not exceed 5%” and cannot find a definition. 5% of what?	?	To be considered at TC level. Not related to compliance with RID/ADR.	
UK2	10.5 & 2	The standard EN 473 has been withdrawn and replaced	EN ISO 9712		

UK3	13.1	Type approval certificate is not mentioned here, but is required by ADR 1.8.7.7.2 and 3	Add '(c) a copy of the (design) type approval certificate.'	To be discussed by WG STD's	
UK4	13.3	1.8.7.1.5 of ADR requires documents to be kept for 20 years.	Replace ten with twenty		
D1	5.2.3	Equation 1 is not the correct ADR formula.	Replace "460" by "464"		
D2	D.3.1	In principle the equation D.3 is the same as in the former version of the standard. With this formula it is not guaranteed that for all allowed material grades of the tank shell the max. permissible stress according 6.8.2.1.16 ADR is met. This formula produces sometimes minimum shell thicknesses as smaller as required according to 6.8.2.1.17 ADR. Therefore the standard is not conform with ADR in the field of the calculation of the minimum wall thickness.	Add the ADR formulae (6.8.2.1.17 ADR) in the standard.		
<b>Decision of the STD's WG:</b>	Accepted Refused Postponed	Additional comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
			EN 12493:2001 (except Annex C)		
			EN 12493:2008 (except Annex C)		
			EN 12493:[2013] (except Annex C)	Until further notice	

## Dispatch 4

<b>FprEN 14025:2013</b>	<b>Tanks for the transport of dangerous goods – Metallic pressure tanks – Design and Construction</b>	<b>Where to refer in RID/ADR: 6.8.2.6.1</b>	<b>Applicable sub-sections and paragraphs: 6.8.2.1 and 6.8.3.1</b>
WI 296049			
<p>Assessment, dated 2.2.2013 (Dispatch 4).  Summary of conclusions:  <i>There are no clauses and no normative references contradicting related provisions of RID/ADR. It can be approved.</i>  <i>A few improvements are required to be implemented prior to publication as outlined in the Annex to this assessment.</i></p> <p>Proposed follow-up action:</p>			

<i>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.</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
No comments received					
<b>Decision of the STD's WG:</b>	Accepted Refused Postponed	Additional comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
			EN 14025:2003 + AC:2005	Between 1 January 2005 and 30 June 2009	
			EN 14025:2008	Between 1 July 2009 and 30 June 2015	
			EN 14025:[2013]	Until further notice	

Dispatch 6

<b>FprEN 14334:2012</b> 2 <sup>nd</sup> submission	<b>LPG equipment and accessories – Inspection and testing of LPG road tankers</b>	<b>Where to refer in ADR:</b> <b>6.8.2.6.2</b>	<b>Applicable sub-sections and paragraphs:</b> <b>6.8.2.4 and 6.8.3.4</b>
WI 286130			
<p>Assessment, dated 22.2.2013, Dispatch 6.</p> <p>Summary of conclusions:</p> <p><i>This second FV draft considers the majority of my comments on the first FV draft and those of the STD's WG. With respect to the compliance with ADR, there is still the alternative to the hydraulic pressure test which contradicts ADR. This is why this assessment is still negative. However, the related application for amendment of ADR submitted to the Joint Meeting in March 2013 may lead to an alignment of standard and regulation.</i></p> <p><i>It is also required to ask the Plenary of the Joint Meeting whether or not EN 14334 shall be referenced as a LPG specific inspection standard in addition to EN 12252, which is already referenced in ADR, as a general rule for all types of tank vehicles, including LPG- tanks.</i></p> <p><i>Some earlier comments of technical and editorial nature require still improvement of the standard.</i></p> <p>Follow-up action by the Joint Meetings STD's WG:</p> <p><i>Following the persistent intention of the LPG industry to follow this standard instead of EN 12972, it is required to address the new FV draft as a candidate for reference in ADR (2015), subsection 6.8.2.6.2 indicating subsections 6.8.2.4 and 6.8.3.4 as applicable and in context with the discussion of ADR 2015 by ECE/TRANS/WP.15/AC.1/2013/6.</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
No comments received					
<b>Decision of the STD's WG:</b>		Accepted Refused Postponed	Additional comments		

### C. Standards at Step 4: Published standard

Dispatch 6

EN ISO 13088:2012	Gas cylinders - Acetylene cylinder bundles - Filling conditions and filling inspection (ISO 13088:2011)	Where to refer in RID/ADR: 4.1.4.1, P200(11) and 6.2.3.9.7.2.	Applicable sub-sections and paragraphs: 4.1.4.1, P200(p), 4.1.6		
WI 023175					
<p>Assessment, dated 18.2.2013, Dispatch 6.            Summary of conclusions:  <i>There are no contradictions between EN ISO 13088:2012 and the relevant provisions of RID/ADR. However, further alignment with these provisions is recommended, as well as a few improvements.</i></p> <p>Proposed follow-up action:  <i>This standard needs to be discussed by the STD's WG as a replacement of EN 12755, referenced in RID/ADR 4.1.4.1, P200(11) and in 6.2.3.9.7.2.</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
UK1	Gen	<i>The European Annex requested has been excluded from both the ISO and the EN ISO.</i>	<i>Retain EN 1975 as a reference.</i>	For consideration by WG STD's.	
UK 2		<i>The shortcomings in the ISO text are noted and the assessment will be brought to the attention of the Convenor since these are also non-compliances with the UN Model Regulations</i>			
<b>Decision of the STD's WG:</b>		Accepted Refused Postponed	Additional comments		