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## 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, 18–22 March 2013

Item 5 (b) of the provisional agenda

##### **Proposals for amendments to RID/ADR/ADN: new proposals**

### 6.2.3.9 Marking of refillable pressure receptacles

Transmitted by the European Industrial Gases Association (EIGA)<sup>1, 2</sup>

#### Introduction

1. EIGA introduced in ECE/TRANS/WP.15/AC.1/2009/30 and in informal document INF.31 at the September 2010 session of the Joint Meeting changes to the marking of refillable pressure receptacles specifically relating to the marking of cylinder bundles. The intent of this was to improve the clarity of the requirements for the marking of cylinder bundles. The changes were introduced into the 2013 edition of RID/ADR/ADN.

2. It has recently come to light that a number of existing bundles of cylinders will not fully comply with the requirements of the new provisions, and for this reason EIGA is requesting that transitional measures are introduced into the 2015 edition of RID/ADR/ADN and that to cover the period until the publication of the 2015 edition, a multilateral agreement is put in place.

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<sup>1</sup> In accordance with the programme of work of the Inland Transport Committee for 2010-2014 (ECE/TRANS/208, para.106, ECE/TRANS/2010/8, programme activity 02.7(c)).

<sup>2</sup> Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2013/15.

## **Proposal**

"1.6.2.X Bundles of cylinders manufactured before 1 July 2015 in accordance with the requirements applicable up to 31 December 2014 need not be marked in accordance with 6.2.3.9.7.2 and 6.2.3.9.7.3 until the next periodic inspection and test."

## **Justification**

3. The marking of bundles of cylinders has been clarified by the introduction of the text in 6.2.2.7.9, "For bundles of cylinders, pressure receptacle marking requirements shall only apply to the individual cylinders of a bundle and not to any assembly structure." and with the new 6.2.3.9.7 in RID/ADR 2013. This will ensure a consistent approach.

4. However, a recent review by industry has indicated that not all bundles of cylinders will comply with these new requirements, and as a consequence there is the request to introduce a transitional measure into the 2015 edition of RID/ADR/ADN, and as well a Multilateral Agreement to cover the period between the 2013 and 2015 publications.

## **Safety**

5. No safety implications foreseen.

## **Feasibility**

6. No specific problem.

## **Enforceability**

7. No difficulty in enforcement is envisaged.

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