

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

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Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN:

New proposals

Amendments of paper ECE/TRANS/WP.15/AC.1/2014/16 Marking of Bundles of cylinders

**Transmitted by the International Organisation for Standardisation
(ISO)**

Introduction

1. Further consideration of the provisions for marking bundles of cylinders has resulted in a realisation that the text adopted as a result harmonization with UN requirements is not fully correct. In addition, comments from industry have pointed out that the plate bearing the marks applied at time of manufacture may not have sufficient space for the periodic inspection marks so a separate similar plate should be permitted. Furthermore, a transition provision is required since a plate on the bundle frame has not been used for marking in all cases.

2. The adopted harmonization text is as follows.

“6.2.3.9.7 *Marking of bundles of cylinders*

Markings shall be in accordance with sub-section 6.2.2.10, except that the United Nations packaging symbol specified in 6.2.2.7.2 (a) shall not be applied.”

This text would require RID/ADR bundles of cylinders to be composed of cylinders which (apart from the UN packaging symbol) are marked in accordance with 6.2.2.10.1 and hence 6.2.2.7 when in fact these cylinders should be marked in accordance with 6.2.3.9.1 to 6.2.3.9.6.

3. Therefore it is necessary to split the proposal 1 in paper ECE/TRANS/WP.15/AC.1/2014/16 into three parts:

- (a) Marking of cylinders (in accordance with RID/ADR);
- (b) Marking of the bundle with manufacturing, operational and certification marks (in line with UN requirements) and
- (c) Marking (required by RID/ADR) for periodic inspection.

Proposal 1

4. Amend 6.2.3.9.7 to read as follows:

- 6.2.3.9.7 *Marking of bundles of cylinders*
- 6.2.3.9.7.1 Individual cylinders in a bundle of cylinders shall be marked in accordance with 6.2.3.9.1 to 6.2.3.9.6, as applicable.
- 6.2.3.9.7.2 Marking of bundles of cylinders shall be in accordance with sub-section 6.2.2.10.2 and 6.2.2.10.3, except that the United Nations packaging symbol specified in 6.2.2.7.2 (a) shall not be applied.
- 6.2.3.9.7.3 In addition to the preceding marks, each bundle of cylinders that meets the periodic inspection and test requirements of 6.2.4.2 shall be marked indicating:
- (a) The character(s) identifying the country authorizing the body performing the periodic inspection and test, as indicated by the distinguishing sign of motor vehicles in international traffic. This marking is not required if this body is approved by the competent authority of the country approving manufacture;
- (b) The registered mark of the body authorised by the competent authority for performing periodic inspection and test;
- (c) The date of the periodic inspection and test, the year (two digits) followed by the month (two digits) separated by a slash (i.e. "/"). Four digits may be used to indicate the year.
- The above marks shall appear consecutively in the sequence given either on the plate specified in 6.2.2.10.2 or on a separate plate permanently attached to the frame of the bundle of cylinders.

Transition provisions

5. The transition provision 1.6.2.13 agreed at the Joint Meeting in March 2013 for the marking of bundles of cylinders is as follows.

"1.6.2.13 Bundles of cylinders manufactured before 1 July 2013 which are not marked in accordance with 6.2.3.9.7.2 and 6.2.3.9.7.3 may be used until the next periodic inspection and test after 1 July 2015."

This provision covers manufacturing, operational and certification marking applied at the time of manufacture. If the above proposal 1 is adopted in the 2015 RID/ADR, the provision 6.2.3.9.7.3 will cover periodic inspection marking, which was not intended. It is proposed therefore to revise the transition provision to exclude this periodic inspection marking.

Proposal 2

6. In order to retain the requirements intended when 1.6.2.13 was adopted it is necessary to amend the transition provision as shown below (with new text underlined).

"1.6.2.13 Bundles of cylinders manufactured before 1 July 2013 which are not marked in accordance with 6.2.3.9.7.2 and 6.2.3.9.7.3 applicable from 1 January 2013 or 6.2.3.9.7.2 applicable from 1 January 2015 may be used until the next periodic inspection and test after 1 July 2015."

7. Paper 2014/16 states that its proposal is intended to fill a gap in the regulations and also states in the justification that inspection bodies have already applied the specified

marking in the same way that they do for all other pressure receptacles. However, in the absence of a specification of where the periodic inspection marks should be applied, various means of marking have been employed. Therefore a transition measure is necessary.

Proposal 3

8. The following transition provision allows time to bring the bundles of cylinders into conformity with the new detailed requirements for marking on a plate:

- 1.6.2.14 Bundles of cylinders periodically inspected before 1 July 2015 which are not marked in accordance with 6.2.3.9.7.3 applicable from 1 January 2015 may be used until the next periodic inspection and test after 1 July 2015.
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