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, 17–21 March 2014 Item 3 of the provisional agenda Standards

6 March 2014

Agreed comments by participants 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.1/2014/11, 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 2013, 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.1/2014/11 because they became available only after the deadline for submission of working papers for the Joint Meeting.
- 3. The following telecons were organized by CCMC on 17, 18, 19 and 20 February to the subjects
 - Pressure receptacles (except for LPG)
 - · LPG receptacles and tanks
 - · Valves and
 - Tanks (including cryogenic vessels).

The agreed comments of the Working Group on Standards (Std's WG) are compiled in this document.

- 4. Unresolved issues require a continued discussion and final conclusions during the March session week of the Joint Meeting This concerns the following draft standards:
 - FprEN 14334,
 - EN 1626:2008 and
 - EN 13648-1 :2008.
- 5. Proposals on the amendment of RID/ADR/ADN to become effective by 1.1.2015 are part of the separate meeting report of the Working Group on Standards which will be agreed with the members of the STD's WG.



Annex

A. Standards at Stage 2: Submitted for Public Enquiry

Dispatch 1

prEN ISO/DIS 16148	Gas cylinders — Refillable seamless steel gas cylinders and tubes — Acoustic emission	Where to refer in RID/ADR:	Applicable sub-sections and paragraphs: 6.2.1.6.1
WI 023171	examination (AT) and follow-up ultrasonic examination (UT) for periodic inspection and testing (ISO/DIS 16148)	6.2.1.6.1	

Assessed by CEN Consultant on 26.9.2013 (Dispatch 1)

Summary of conclusions

This revised edition ISO 16148 isn't related to dedicated RID/ADR provisions and can be promoted to the FV stage. The previous edition is referenced in RID/ADR as a guidance document. This reference needs to be updated and adapted to the broadened scope. No European modifications are required.

Country	Clause No.	Comment (justification for change)	Proposed change	Comments by STD's WG
UK	General	The current edition of this standard is referenced in 6.2.1.6.1 which is UN text. The revised version will be proposed by ISO to the UN Sub Committee of Experts as soon as it published.	None. It is good to know that the Consultant approves.	The WG takes note of the envisaged intention of submitting the revised issue for reference in the UN Model Regulations. The referencing of the EN version in RID/ADR is questioned. The following note may be added where the ISO standard is referenced: **NOTE: The EN version of this ISO standard fulfils the requirements and may also be used. in RID/ADR.** However, the EN version is expected to be available 2015-02, i.e. too late as to be considered for the 2015 edition of RID/ADR.

prEN 16631 WI 286146	LPG equipment and accessories - Pressure relief valves for LPG pressure vessels - Reconditioning requirements	Applicable sub-sections and paragraphs: No related provisions UK: Related amendments awaited (dedicated ad hoc group established in March 2013)
	1 1 7 2 2014 (D: + 1 1)	

Assessment by CEN Consultant on 7.2.2014 (Dispatch 1).

Summary of conclusions

prEN 16631 includes very limited relationship with RID/ADR and is considered compliant with these. It is a supportive standard and can be approved.

Comments from members of the Joint Meeting:

Country	Clause No.	Comment (justification for change)	Proposed change	Comments by STD's WG
UK1	General		Not a candidate for referencing.	
UK2		Gas cylinders are not usually considered to be included in the description 'pressure vessels', so is it possible that PRVs used in gas cylinders are not in the scope of this standard?		The addition of a definition of the term "pressure vessel" and its relationship with the concerned RID/ADR terms is recommended.

Dispatch 2

- "	ogenic vessels - Large transportable vacuum- solated vessels - (ISO/DIS 20241-2), Part 2 Operational requirements	Where to refer in RID/ADR: 6.8.2.6.2	Applicable sub-sections and paragraphs: 6.8.2.4.2, 6.8.2.4.3, 6.8.2.4.4 and 6.8.3
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Assessed by CEN Consultant on 5.2.2014 (Dispatch 2)

Summary of conclusions

Major elements of the RID/ADR provisions related to the scope of the standard are not or not adequately covered by the standard.

One of the normative references - EN ISO 204421-1 - has the potential to conflict with RID/ADR. It needs to be assessed for compliance with RID/ADR prior to the approval of EN ISO 20421-2.

European modifications are required, if this standard is intended for reference in RID/ADR, chapter 6.8. If the standard should be limited to portable tanks acc. to RID/ADR chapter 6.7 then it is no candidate for reference.

Country	Clause No.	Comment (justification for change)	Proposed change	Comments by STD's WG
				The WG doesn't support the referencing of this standard as it is considered rather more a guideline for users and is not considered appropriate for

			referencing.
FR	General	Received after telecon: The chairman of ISO TC 220 and CEN 268 doesn't agree with this proposal. Indeed, he thinks that this standard clarifies the role of each person, what is the organisation responsibility and what is the owner responsibility.	This comment requires additional discussion by the WG.

B. Standards at Stage 3: Submitted for formal vote

Dispatch 1

FprEN ISO 10462 rev	Acetylene cylinders — Periodic inspection and maintenance (ISO/FDIS 10462:2013)	Where to refer in RID/ADR:	Applicable sub-sections and paragraphs: 6.2.1.6.1 and 6.2.3.5		
WI 023167		6.2.4.2			
Assessed by CEN Consultant on 15.8.2013 (Dispatch 1)					

Summary of conclusions

FprEN ISO 10462 fully covers all relevant RID/ADR provisions on the periodic inspection of acetylene cylinders. The standard is can be approved. The linkage with RID/ADR needs be considered in the European foreword.

Country	Clause No.	Comment (justification for change)		Proposed change	Comments by STD' WG
UK	General	transition (20 standard beinto EN 14189 Insert EN IS	periodic testing standards is for a 2-year 015 to end of 2016) with the supersededing shown for that period. See references and EN ISO 22434 for example. O 10462 following the reference to EN Mandatorily from 1 January 2017' in the	1. Delete reference to EN 14189:2003. 2. Add 'Until 31 December 2016 to EN 12863.	The WG agrees. As part of his report to Plenary, the Consultant will prepare detailed amendments on the references to EN ISO 10462 and EN 12863 in line with the proposed changes. It was also agreed in this context to address the deletion of EN 14189 which has been replaced by EN ISO 22434:2011 (referenced in RID/ADR 6.2.4.2 as EN ISO 22434:2012).
Decision of the STD's WG: Accepted Additional comments		nents			

Dispatch 2

FprEN 14140 :2013 2 nd submission	LPG Equipment and accessories – Transportable refillable welded steel cylinders for LPG –	Where to refer in RID/ADR	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4
WI 286127	Alternative design and construction	6.2.4.1	

Assessed by CEN Consultant on 23.12.2013 (Dispatch 2)

Summary of conclusions

The text of FprEN 14140:2013, 2nd submission, doesn't contradict any of the related provisions of the 2013 edition of RID/ADR and can be approved. Essential editorial improvement is recommended.

Owing to the fact that the RID/ADR provisions are under discussion to comprise over-moulded cylinders and may be agreed to be amended during the forthcoming session of the Joint Meeting in March 2014 a final judgment on the compliance of standard and the 2015 edition of RID/ADR is not possible at this point of time.

Committee draft 2013-03 discussed and postponed by STD's WG in September 2013 with comments (see INF.22 rev).

Country	Clause No.	Comment (justification for change)		Proposed change	Comments by STD' WG	
UK	General	over-moulded cylinders have been identified by the Consultant. In other respects the standard can be		Regulations recognise the periodic inspection and technology database requirements.	The WG takes note of the i CEN/TC 286 that the sugge of the Consultant have been	ested editorial amendments
Decision of the STD's WG:		Accepted	Additional comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
				EN 14140:2003	Between 1 January 2005 and 31 December 2010	
				EN 14140:2003 + A1:2006	Between 1 January 2009 and 31 December 2016	
				EN 14140 [2014]	Until further notice	

FprEN 13175 rev	LPG Equipment and accessories - Specification and testing for Liquefied Petroleum Gas (LPG) pressure	Where to refer in RID/ADR: 6.2.4.1	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.3 and
WI 286159	vessel valves and fittings	and ADR 6.8.2.6.1	6.8.2.1.1, 6.8.2.2, 6.8.2.4.1 and 6.8.3.2.3,
			respectively.

Assessed by CEN Consultant on 10.12.2013 (Dispatch 1)

Summary of conclusions

This draft of the standard complies with the related provisions of ADR and can be approved. Three editorial improvements are recommended to support the application of some ADR provisions.

Comments from members of the Joint Meeting:

	Country	Clause No.	C	omment (justification for change)	Proposed change	Comments by STD' WG		
	UK	General	Consultant'	s assessment supported		See comment below.		
Decision of the STD's WG: Accepted The WG a		Addition The WG agrees that this standard shall be a Clarification shall be included in the RID/Apropose detailed text for inclusion RID/AD	ADR reference text in 6.2	oressure drums. 2.4.1. The Consultant will	No transition regulation required			

FprEN 14334 3rd submission	LPG equipment and accessories — Inspection and testing of LPG road tankers	Where to refer in RID/ADR:	Applicable sub-sections and paragraphs: 6.8.2.4 (except 6.8.2.4.1), 6.8.3.4.2 and 6.8.3.4.9
WI 286163		6.8.2.6.2	

Assessed by CEN Consultant on 7.12.2013 (Dispatch 1)

Summary of conclusions

This FV draft complies with all related ADR provisions with the exception of the alternative to the hydraulic pressure test which has been applied to be included in the 2015 edition of ADR. It can be approved in the expectation that this amendment of ADR will be adopted.

In case that this approach should fail it was agreed by the STD's WG that the reference text in ADR would need to exclude the alternative (clause 5.5.8) from application.

Country	Clause No.	Comment (justification for change)	Proposed change	Comments by STD's WG
D1	3.13	According to ADR it seems that the pressure defined in 3.13 is the maximum working pressure and not the calculation pressure of the tank.	Replace "calculation pressure" in "maximum working pressure". Comment withdrawn as it was related to earlier draft.	No longer relevant

D2	General			Applicable subsections and paragraphs: 6.8.2.4 (except 6.8.2.4.1) and 6.8.3.4.2, 6.8.3.4.9	Supported. Applicable subsections and paragraphs to be determined following the decisions of the Tank Working Group.	
UK	General	Consultant's ass	essment supported			
Decision of the STD's WG:		Preliminary accepted	Additional comments: Accepted under the condition that the Tank Working Group will accept the NDT procedures as an alternative of the hydraulic test. This decision will determine which subsections and paragraphs will be declared as applicable in the reference table.		No transition regulation required.	

Dispatch 2

EN 12493:2013 +prA1	LPG equipment and accessories – Welded steel tanks for LPG – Road tankers, Design and	Where to refer in ADR:	Applicable sub-sections and paragraphs: 6.8.2.4 and 6.8.3.4
WI 286164	manufacture	6.8.2.6.1	

Assessed by CEN Consultant on 5.12.2013 (Dispatch 2)

Summary of conclusions

The draft of the amendment fully covers the request by the Working Group on Standards put forward at its meeting in March 2013. It can be approved. A slight modification of the modification to 5.2 is proposed.

Country Clause No.		Co	omment (justification for change)	Proposed change	Comments by STD's WG	
D prA1 The Annex A1/modification in 5.2 hasn't been distributed.		Withdrawn				
UK	General	The amendment is satisfactory – UK has no comments.				
Decision of the STD's WG:		Accepted	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)	Between 1 January 2001and 31 December 2010	
				EN 12493:2008 (except Annex C)	Between 1 January 2009 and 31 December 2013	

	EN 12493:2013 +A1:[2014]	Until further notice	
	(except Annex C)		

Dispach 2

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FprEN ISO 10297	Gas cylinders - Cylinder valves - Specification and type testing (ISO/DIS 10297:2012)	Where to refer in RID/ADR:	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.3
WI 023148	type testing (150/D15 10277.2012)	6.2.4.1	0.2.5.1 and 0.2.5.5

Assessed by CEN Consultant on 9.1.2014 (Dispatch 2)

Summary of conclusions

FprEN ISO/FDIS .10297 complies with the related provisions of RID/ADR and can be approved. The foreword of the EN edition of the standard shall indicate the relationship with RID/ADR with the agreed text and also with the TPED with respect to the pi-marking.

Comments from members of the Joint Meeting:

Country	Clause No.	. Comment (justification for change)		Proposed change	Comments by STD's WG	
FR		Received after telecom from chairman of CEN/TC 23/SC2, responsible of this standard: It is important to refer it because bundle valves are particularly treated.			Not discussed in detail in th from participants of the Join	
Decision of the STD's WG:		Accepted	Additional comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
				EN ISO 10297:2006	Between 1 January 2009 and 31 December 2016	
				EN ISO 10297:[2014]	Until further notice	

Dispatch 2

FprEN ISO 14246 2 nd submission	Gas cylinders - Cylinder valves - Manufacturing tests and examinations (ISO/DIS 14246:2010)	Where to refer in RID/ADR:	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4
WI 023151		6.2.4.1	

Assessed by CEN Consultant on 8.1.2014 (Dispatch 2)

Summary of conclusions

FprEN ISO 14246 (2nd submission) can be approved. An editorial amendment of the scope is required. A merger with EN ISO 10297 is suggested for future revisions. Follow-up action by the Joint Meetings STD's WG

Comme	nts from mei	nbers of the	Joint Meeting:			
Country	Clause No.	Co	omment (justification for change)	Proposed change	Comments by	y STD's WG
UK 1	General	this standard RID/ADR w	Consultant's assessment and agree that I should be included in future editions of then there is relevant text on initial f valves.			
UK 2	1. Scope	inspection of valves. Taking the CEN Consultant's point in paragraph 3.3 of his assessment, I suggest the first sentence and its following list be further simplified as shown in the next column.		of "This International Standard specifies the procedures and acceptance criteria for manufacturing testing and examination of cylinder valves that have been designed and type tested in accordance with ISO 10297." Delete d) from the subsequent list. Move the Note to end of clause 1.		
FR		Received after telecom from chairman of CEN/TC 23/SC2, responsible of this standard: This standard must be referenced.				
Decision of the STD's WG:		Accepted	Additi	onal comments	1	No transition regulation required

10	Dispatch 4
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	EN 16509 023165	transportable including liquefied g	e gas cylinders — Non-refillable, small e, steel cylinders of capacities up to and g 120ml containing compressed or gases (compact cylinders) — Design, astruction, filling and testing	Where to refer in RID/ADR 6.2.6.4	Applicable sub-sections and paragraph 6.2.6.1 – 6.2.6.3	
Summar _. T	y of conclusion There are a f	ons	1.2014 (Dispatch 4) Illiances with the preliminary text of RIII /ADR.	D/ADR 2015 which ren	der the FV draft unaccept	table for approval and an
Comme	nts from me	mbers of the J	oint Meeting:		,	
Country	Clause No.	Con	Comment (justification for change) Proposed change Comment		Comments b	y STD's WG
UK	General	standard has b now in confor Formal Vote	N Consultant's negative assessment, the been revised and I believe the FprEN is mitty with RID/ADR. However, the will not end until May and publication secretariats' deadlines for 2015.	Suggest consideration of this standard is held over until September if the Standards WG does not see the revised text.	See text below.	
Decision STD's V		Postponed	Addit The WG takes note that the comments fredraft which was resubmitted for formal v 20.1.2014). However, this draft has not y in time. Following the information given that its assessment by the Consultant wil The Consultant will prepare detailed text Plenary. He will identify this amendmen the approval process will be completed a	vote (CCMC request from yet been provided to the and the WG accepts this draws of the positive. If for amendment of 6.2.6 that as relevant for the 2017	n 23.1.2014 with deadline Joint Meeting participants aft for reference, provided 4.4 as part of his report to 7 edition of RID/ADR as	No transition regulation required

Not dispatched

FprEN ISO/FDIS 11120 WI 286165	Gas cylinders — Refillable seamless steel tubes of water capacity between 150 l and 3000 l — Design construction and testing	Where to refer in RID/ADR: 6.2.4.1	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4				
Assessment by CEN of	Assessment by CEN consultant to be dispatched.						
Comments from members of the Joint Meeting:							

Country	Clause No.	Con	nment (justification for change)	Proposed change	Commen	ts by STD's WG
UK	General	Standards WC has become cl published. Th account of this	tive conclusion to the review by the positive assessment in Sept. 2012, it ear that the European Annex cannot be a FDIS has been modified to take and it could then receive a positive this final FDIS text was submitted to ISO anuary.		Not discussed in detail as this draft was not provided in time to the Joint Meeting participants.	
Decission of the STD's WG:		Postponed	Additional comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
				EN ISO 11120:1999	6.2.3.1 and 6.2.3.4	To be determined
				EN ISO 11120:1999 + A1:2013	6.2.3.1 and 6.2.3.4	To be determined
				EN ISO 11120:2014	6.2.3.1 and 6.2.3.4	Until further notice

B. Standards at Stage 4: Published standards

Dispatch 1 from September 2012

•	ders - Refillable seamless aluminium alloy nders - Design, construction and testing (ISO/FDIS 7866:2012)	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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Assessed by CEN Consultant on 22.6.2012 (Dispatch 1 September 2012)

Summary of conclusions

There are no non-compliances between FprEN FDIS 7866 and RID/ADR 2011 as amended to become effective on 1.1.2013.

Comments by the Standards Working Group on the second enquiry text of the standard and of my assessment of the second FV text have mostly been disregarded. Editorial improvements are still required as well as for the ISO- text as well as for the European Annex. Details are added in form of the e-balloting template.

It's emphasized that this assessment would be negative if no European Annex is added, as proposed.

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Country	Clause No.	Comment (justification for change)	Proposed change	Comments by STD's WG
UK		Since the previous review of this standard by the Standards Working Group it has been made clear that	*	The WG realizes that all comments of the Consultant are of editorial nature and may be considered for
		EN ISO standards cannot be modified by the addition of an Annex giving specific information and	wishes of industry (EIGA and ECMA	future revisions. They are no reason to refuse the

		rejected by t	the Standards WG because of errors in the nnex which was suppressed at	members). The Consultant's comments are reviewed below to enable an informed debate on the issues raised by the loss of the Annex	reference in RID/ADR	
FR		23/SC2:	ter telecom from chairman of CEN/TC cant to refer this standard particularly for retest.			
	Decision of the STD's WG:		Adequate regulation for replacement of EN for new type approvals based on EN 1975	Additional comments regulation for replacement of EN 1975 is required (with a 2 years transition period ype approvals based on EN 1975). The Consultant will prepare detailed text for ent of 6.2.4.2 as part of his report to Plenary.		

Dispatch 1 from September 2008

EN 1626 :2008	Cryogenic vessels – Valves for cryogenic service	Where to refer in ADR	Applicable sub-sections and paragraphs: 6.8.2.4 and 6.8.3.4
WI 268052		6.8.2.6.2	0.0.2.4 and 0.0.5.4

Assessed by CEN Consultant on 7.3.2008 (Dispatch 1 September 2008)

Summary of conclusions

EN 1626 deals with issues regulated by ADR/RID. It does not fully cover all relevant ADR/RID provisions. However it does not conflict with relevant provisions. So far, EN 13648-1 is considered to be a supportive document in context with the transport regulations. It can be adopted.

Some editorial deficiencies would need to be considered, once this standard should be submitted to be referenced in ADR/RID..

Country	Clause No.	Comment (justification for change)	Proposed change	Comments by STD's WG
UK1	General	The assessment covers only Chapter 6.2, but with a scope extending to DN 150, it should also be considered for Chapter 6.8 applications.		WG realizes that this standard is relevant for stationary and transportable tanks. Whether receptacles are included remains unclear. Clarification is required.
UK2		No objection to it being referenced subject to it being fully assessed against tank requirements and for potential conflict with RID/ADR in the normative		Agreed.

FR	268: With AFNC noted. But the proceed due countries, and the countries of	PR, comments already made have been the revision of the standard is difficult to to the CEN which asks experts from 5 and it is difficult to convince 5 countries, but will be possible soon.		
Decision of the STD's WG:	Postponed	Addition Discussion needs to be continued.	onal comments	No transition regulation required

Dispatch 1 from September 2008

EN 13648-1 :2008	Cryogenic vessels – Safety devices for protection	Where to refer in	Applicable sub-sections and paragraphs:
WI 286066	against excessive pressure – Part 1: Safety valves for cryogenic service	RID/ADR 6.2.4.1	6.2.3.1 and 6.2.3.4

Assessed by CEN Consultant on 7.3.2008 (Dispatch 1 September 2008)

Summary of conclusions

The amended version of EN 13648-1 deals with issues regulated by ADR/RID. It does not fully cover all relevant ADR/RID provisions. However it does not conflict with relevant provisions. So far, EN 13648-1 is considered to be a supportive document in context with the transport regulations. It can be adopted. Some editorial deficiencies, should be removed

Country	Clause No.	Comment (justification for change)	Proposed change	Comments by STD's WG
UK1	General	The assessment covers only Chapter 6.2, but with a scope extending to DN 100, it should also be considered for Chapter 6.8 applications.		WG realizes that this standard is relevant for stationary and transportable tanks. Whether receptacles are included remains unclear. Clarification is required.
UK2	General	No objection to it being referenced subject to it being fully assessed against tank requirements and for potential conflict with RID/ADR in the normative references		Agreed.
FR		Received after telecom from chairman of CEN/TC 268: With AFNOR, comments already made have been noted. But the revision of the standard is difficult to		

	countries, an	te to the CEN which asks experts from 5 and it is difficult to convince 5 countries, but t will be possible soon.	
Decision of the STD's WG:	Postponed	Additional comments Discussion needs to be continued.	No transition regulation required

C. General purpose standard

Dispatch 3

-	EN 3-8 07041	Portable fire extinguishers - Part 8: Requirements for the construction, pressure resistance and mechanical tests for extinguishers with a maximum allowable pressure equal to or lower than 30 bar, which comply with the requirements of EN 3-7.	Where to refer in RID/ADR/ADN: Not referenced	Applicable sub-sections and paragraphs: None				
CEN Consultant: Part 8 isn't referenced in RID/ADR/ADN in difference to Part 7 of EN 3 which is referenced in ADR 8.1.4.3.								
Comments from members of the Joint Meeting:								
Country	Clause No.	Comment (justification for change)	Proposed change	Comments by STD's WG				
UK	itself with th	nly references EN 3-7. I do not see why the Standards W ne requirements of this standard since, by declaration in the scovered by it are in conformity with the referenced standards.	Supported.					
Conclusion of STD's WG: No action required for the Joint Meeting								

20	ISO/FDIS 0346 07041	Personal protective equipment - Protective footwear (ISO/FDIS 20346:2014)	Where to refer in RID/ADR: ADN 1.2.1 Protective shoes	Applicable sub-sections and paragraphs:				
CEN Consultant: So far, ADN refers to EN 346:1997 with respect to protective shoes the choice of which "shall correspond to the dangers likely to arise". A replacement by EN ISO 20346 (or ISO 20346) is suggested to support international application.								
Comments from members of the Joint Meeting:								
Country	Clause No.	Comment (justification for change)	Proposed change	Comments by STD's WG				
UK	The subject of the standard has no possibility of conflict with the requirements for the transport of dangerous goods. A simple replacement of the old edition with this one risks			The WG suggests a transition period for the old equipment				

forcing the premature replacement a lot of serviceable and safe protective footwear. The old and new versions of the standard should be listed for an overlapping period.

Conclusion of STD's WG: The idea of a transition clause is recommended to be suggested to the Joint Meeting. Comments by Consultant: As an alternative, an undated reference could be justified.