United Nations ECE/TRANS/WP.15/AC.1/2014/7

Economic and Social Council

Distr.: General
20 December 2013

Original: English

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 5(a) of the provisional agenda
Proposals for amendments to RID/ADR/ADN: pending issues

Addition to RID/ADR 1.8.6.4.1

Transmitted by the Governments of Belgium and Germany[1, 2]

Summary

Executive summary:	Specification of different accreditation possibilities for entities to which specific testing tasks are delegated according to 1.8.6.4 of RID/ADR.
Action to be taken:	Addition to RID/ADR 1.8.6.4.1
Related documents:	Informal document INF.19 and report of the last but one session of the Joint Meeting (Bern, 18 to 22 March 2013) (ECE/TRANS/WP.15/AC.1/130), paragraph 60; Document ECE/TRANS/WP.15/AC.1/2013/58 and informal document INF.33/Rev.1 of the last session of the Joint Meeting (Geneva, 17 to 27 September 2013) (ECE/TRANS/WP.15/AC.1/132), paragraph 64.

[1] In accordance with the programme of work of the Inland Transport Committee for 2012–2016 (ECE/TRANS/224, para. 94, ECE/TRANS/2012/12, programme activity 02.7 (A1c)).

[2] Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2014/7.

Introduction

1. In 1.8.6, an important requirement for approval as an inspection body is that the body must be accredited according to standard EN ISO/IEC 17020:2012. This standard describes the requirements to be met by bodies performing inspection tasks. According to this standard, "inspection" is a two-step procedure consisting of testing and subsequent assessment, i.e. the testing step is followed by an assessment on the basis of certain criteria, e.g. technical requirements laid down in other standards or codes.

2. According to 1.8.6.4, the approved inspection body in accordance with 1.8.6 may delegate some of its tasks to other entities (subcontractors, subsidiaries) which must be included in the accreditation of the inspection body or accredited separately.

3. If only testing tasks are delegated to these entities (no assessment activities), it is generally agreed that these entities need only be accredited in accordance with standard EN ISO/IEC 17025:2005. This standard describes the requirements to be met by testing laboratories.

According to EN ISO/IEC 17000:2005 and EN ISO/IEC 17025:2005, "inspection" is taken to mean the ascertainment of one or more characteristics on an object of conformity assessment in accordance with a procedure, where procedure means a specified method of carrying out an activity or process. These procedures include those laid down in normative documents. These typically include inspections in the context of the design type approval procedure in accordance with 1.8.7.2, inspections in the context of the initial inspection and tests in accordance with 1.8.7.4 and periodic inspections, intermediate inspections and exceptional checks in accordance with 1.8.7.5. Conformity assessment and the issuing of certificates are not part of the inspection tasks (see also 1.8.6.4.3) and must in every case be carried out by the inspection body.

Alternatively, these tasks may, of course, be delegated to entities accredited as inspection bodies in accordance with standard EN ISO/IEC 17020:2012.

4. The recognition of "third party testing laboratories" is carried out by the acting accreditation body under the accreditation procedure in accordance with EN ISO/IEC 17025:2005. In the European Union, these are the so-called "national accreditation bodies".

If the testing laboratory wishes to be recognised as an independent third party, it must demonstrate to the accreditation body that it is impartial and that it and its staff are free from all improper commercial, financial and other influences which might compromise their technical judgement. As an independent third party, the testing laboratory may not carry out activities that might jeopardise confidence in the independence of its assessment and the integrity of its testing activities.

Proposal

5. In RID/ADR 1.8.6.4.1, insert after the first sentence:

> "In the case of separate accreditation, this entity shall be duly accredited according to standard EN ISO/IEC 17025:2005 as well as recognised as a third-party testing laboratory in accordance with 1.8.7.2.2 (b) and (e), 1.8.7.4.2 (a) and 1.8.7.5.1 (b) in order to perform testing tasks, which do not include conformity assessments and the issuing of certificates, or it shall be accredited according to standard EN ISO/IEC 17020:2012 (except No. 8.1.3)."

Justification

Safety:	No problems.
Feasibility:	No problems. It is not necessary to prescribe a transitional period.
Actual application:	Application of the amendment can be monitored and checked by the competent authority in accordance with 1.8.6.1.