# Economic Commission for Europe

Inland Transport Committee

**Working Party on the Transport of Dangerous Goods** **16 March 2015**

**Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods**
Bern, 23-27 March 2015
Item 3 of the provisional agenda
**Standards**

## 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.1/2015/14, which informs about the progress made in the development of new or revised 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 to which CEN could attend (March 2014), standards at enquiry and formal vote stage as well as related assessments by the CEN Consultant (when available) were made available on the dedicated CEN webpage.

3. In absence of budget line for CEN Consultant no telecons could be organized by CCMC early 2015. Comments from MS were compiled by CCMC (Annex below).

4. Unresolved issues are intended to be discussed and final conclusions to be agreed during the March session week of the Joint Meeting.

5. In absence of CEN Consultant the Joint Meeting, CEN will ask the Joint Meeting to appoint one of its delegate to chair the WG Standard during this session. CEN will offer the secretariat support to this Joint Meeting WG Standard.

# Annex

## A. Standards at Stage 2: Submitted for Public Enquiry

Dispatch 3

| **prEN 13807**<br>WI 023180 | **Transportable gas cylinders - Battery vehicles - Design, manufacture, identification and testing** | **Where to refer in RID/ADR:** | **Applicable sub-sections and paragraphs:** |
|---|---|---|---|
| Assessment by CEN Consultant on Sept 2014<br>This standard needs to be discussed by the STD's WG as a replacement to the existing standard EN 13807:2003 referenced in subsection 6.8.3.6 of RID/ADR. | | | |
| **Comments from members of the Joint Meeting:** | | | |

| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG Standards |
|---|---|---|---|---|---|
| UK | General | CEN Consultant's assessment agreed. This can go forward to the FV stage. | | No assessment performed | |
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Dispatch 2

| **prEN ISO 20421-2**<br>WI 268056 | **Cryogenic vessels - Large transportable vacuum-insulated vessels - Part 2: Operational requirements (ISO/DIS 20421-2:2013)** | **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.** |
|---|---|---|---|

Assessment 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.*

Follow-up action by the Joint Meetings STD's WG

*This draft standard shall be discussed as a candidate for reference in RID/ADR, paragraph 6.8.2.6.2 and related to paragraphs 6.8.2.4.2, 6.8.2.4.3, 6.8.2.4.4 and 6.8.3.*

| **Comments from members of the Joint Meeting:** | | | | | |
|---|---|---|---|---|---|
| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG Standards |
| UK | Gen | This standard will replace EN 13530-3:2002. Although EN 13530-2:2002 + A1:2004 is referenced for tank construction, we have never considered referencing Part 3. If we were to reference this EN ISO standard, it would only be to support periodic, intermediate and exceptional inspection. However, the added value of the standard's clause 15 is minimal. The TC should consider the CEN Consultant's recommendations and ensure conformity with the regulations. | My preference is to not add this standard to the references in RID/ADR; the regulations and EN 12972 cover inspection adequately and this EN ISO adds too little to earn a place in RID/ADR. | | |
| DE | Gen | Standards about operational requirements/instructions should not be mentioned in RID/ADR as mandatory standard. There can be a conflict with nationals laws. | | | |
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Dispatch 3

| **prEN ISO 21013-3 rev16631**<br>WI 268060 | **Cryogenic vessels - Pressure-relief accessories for cryogenic service - Part 3: Sizing and capacity determination (ISO/DIS 21013-3:2014)** | **Where to refer in RID/ADR:** | **Applicable sub-sections and paragraphs:** | | |
|---|---|---|---|---|---|
| Assessment Consultant: 15*th Dec 2014*<br>*This draft essentially complies with the related provisions of RID/ADR and doesn't include contradictory regulations. It can be promoted to the FV stage.* | | | | | |
| **Comments from members of the Joint Meeting:** | | | | | |
| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG Standards |
| UK | General | CEN Consultant's recommendations supported. This standard should remain as a normative reference in the standards referenced in RID/ADR – not itself be referenced in RID/ADR | | | |
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Dispatch 2

| prEN 1442 rev<br>WI 286153 | LPG equipment and accessories - Transportable refillable welded steel cylinders for LPG - Design and construction | 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 Consultant on 9.12.2014 (Dispatch 2)
Summary of conclusions:

*This draft essentially complies with the related provisions of RID/ADR and doesn't include contradictory regulations. Improvements are recommended, in particular with respect to over- moulded cylinders. It can be promoted to the FV stage..*

Follow-up action by the Joint Meetings STD's WG:

*This standard needs to be discussed by the STD's WG as an addition to the existing reference to EN 1442:1998 +AC:1999, EN 1442: 1998 + A2:2005 and EN 1442:2006 + A1:2008 in RID/ADR 6.2.4.1, Table, and related to subsections 6.2.3.1 and 6.2.3.4.*

**Comments from members of the Joint Meeting:**

| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG Standards |
|---|---|---|---|---|---|
| UK | General | Agree the CEN Consultant's comments. This can go forward to the FV stage. | | | |
| CH | General | We agree with the CEN consultant but as the over moulded cylinders are specified in RID/ADR, all part concerning this type have not been considered and must be exempt from putting in RID/ADR | | | |
| | 3.1.8 | Note 1 to entry: also see ADR definition<br>-->There is no such definition in RID/ADR | | | |

Dispatch 1

| prEN 1440<br>WI 286154 | LPG equipment and accessories - Transportable refillable traditional welded and brazed steel Liquefied Petroleum Gas (LPG) cylinders - Periodic inspection | Where to refer in RID/ADR: 4.1.4.1P200 (11) and 6.2.4.2 | Applicable sub-sections and paragraphs: P200 (8), (10) and (12) and 6.2.1.6 and 6.2.3.5 |
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Assessment by CEN Consultant on 29.10.2014 (Dispatch 1)
Summary of conclusions:

*This draft is considered compliant with the text of RID/ADR 2015 in the sense of not- conflicting. Some amendments are suggested in the annexed template to be considered for further improvement. Given the fact that this assessment is submitted after the end of the enquiry these suggestions may be considered at the next revision of the standard.*

Follow-up action by the Joint Meetings STD's WG:

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| *This standard needs to be discussed by the STD's WG for reference in RID/ADR subsection 6.2.4.2, Table under "for periodic inspection and tests" and – in addition – in subsection 4.1.4.1, P200(11), Table, indicating (8), (10)v(2) and (12) as applicable requirements.* | | | | | |
| **Comments from members of the Joint Meeting:** | | | | | |
| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG Standards |
| UK | General | Agree the CEN Consultant's comments. This can go forward to the FV stage | | | |
| CH | general | Agree in general with CEN Consultant with some additions | | | |
| CH | 1 | Scope: There should be a reminder that in any case the requirements of RID/ADR take preference<br>e.g. inspection interval, marking.. | When there are contradictions between the standard and RID/ADR, the requirements of RID/ADR take precedence over those of the standard. | Indeed – general principle but better to avoid misleading the standard reader | |
| CH | 2 | Standards referenced in RID/ADR are dated | Put an information into the standard that only the in the regulation dated standards are applicable | Could easily be corrected before FV<br>**Comment from TC23:** This has never been a requirement for normative references in standards | |
| CH | 4 | Table 1, line 3: 15 year interval in connection with brazed cylinders should not be mentioned, even if there is a reference to Annex B | | | |
| CH | 5.2.2.3 | Test equipment: The interval of six month for checking the Pressure gauges is far to long. It should be kept as it was in the old standard (2008). | They shall be calibrated or checked for accuracy against a master gauge at regular intervals and not less frequently than once every month | **TC 286:** Not accepted: Experience has shown that the measurement errors after one month are not relevant. The calibration or check time can be extended with limited impact on the accuracy of the measurement. | |

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| CH | 5.4/5.5 | Valves shall be replaced according to their construction/lifetime. After periodic inspection a new or refurbished/inspected valve should be fitted. Similar to D4, second bullet point | | **TC 286:** Not accepted: already required in 6.2 | |
| CH | 6.4 | Their should be the standard information concerning the predominance of the regulation | | **TC 286 :** When there are contradictions between the standard and RID/ADR, the requirements of RID/ADR take precedence over those of the standard | |
| CH | Annex B | Insert a note as in appendix D | NOTE 2 The application of this Annex is subject to the agreement by the competent authority. | **TC 286:** Agreed | |
| CH | Annex E | E2: Insert a reminder that the cylinder has to be cleaned before starting the inspection. | If required, the cylinder shall be cleaned and have all loose coatings or labels, corrosion products, tar, oil or other foreign matter removed from its external surface; | **TC 286:** Agreed | |
| | | | | | |

Dispatch 1

| **prEN 16728**<br>WI 286156 | **LPG equipment and accessories - Transportable refillable traditional LPG cylinders other than traditional welded and brazed steel cylinders - Periodic inspection** | **Where to refer in RID/ADR: 4.1.4.1P200(11) and 6.2.4.2** | **Applicable sub-sections and paragraphs: 6.2.1.6 and 6.2.3.5** |
|---|---|---|---|

Assessment by CEN Consultant on 3.11.2014 (Dispatch 1)

Summary of conclusions:

*This draft, except for Annex E is considered compliant with the text of RID/ADR 2015 in the sense of not- conflicting. Some amendments are suggested in the annexed template to be considered for further improvement.*

Follow-up action by the Joint Meetings STD's WG:

*This standard needs to be discussed by the STD's WG for reference in RID/ADR subsection 6.2.4.2, Table under "for periodic inspection and tests"*

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| *and – in addition – in subsection 4.1.4.1, P200(11), Table.* | | | | | |
| **Comments from members of the Joint Meeting:** | | | | | |
| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG Standards |
| UK | General | Agree the CEN Consultant's comments, except above summary– it is Annex F that is not compliant, as stated elsewhere in the assessment. This can go forward to the FV stage | | | |
| CH | General | Dispatched version is quit old and as well the Assessment by the CEN consultant. We therefore suggest to postpone the discussion on this standard until the new prEN is available, nevertheless we have some remarks in addition to the assessment. | | | |
| | General | Overmolded cylinders are not yet accepted by RID/ADR. We therefor do not comment parts concerning this type of cylinders. | | | |
| | Titel | "other than brazed and welded cylinders" should be deleted. | 4/2014 - considering the need for consistent Terminology within the work program of the TC; decides to change the title of WI 00286156<br>From:<br>LPG equipment and accessories - Transportable refillable LPG cylinders other than welded and brazed steel cylinders - Periodic inspection<br>To:<br>LPG equipment and accessories - Transportable refillable traditional LPG cylinders other | **TC 286**: Not accepted: see decision 4/2014 of CEN/TC 286 : | |

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|---|---|---|---|---|---|
| | | | than welded and brazed steel cylinders - Periodic inspection | | |
| | 2 | Standards referenced in RID/ADR are dated | Put an information into the standard that only the in the regulation dated standards are applicable | Could easily be corrected before FV **Comment from TC23:** This has never been a requirement for normative references in standards | |
| | 3.8 | Here a period should be specified e.g. within a year otherwise the duration for manufacturing a batch could be endless | | **TC 286** This definition is deleted : production batch stated in Annex F but for this annex, the definition over-moulded cylinder batch applies | |
| | 4 | The first sentence should be complemented as follows: The interval between periodic inspections shall be dependent on the content of a written scheme and , where applicable at least fulfil the requirement of RI/ADR. | | **TC 286**: Not accepted: see the note added in the foreword. | |
| | 5.2.1 | Second sentence should be amended: “The proof pressure test with gas requires ...” | | **TC 286**: Partially accepted: "pneumatic proof test and leak test" | |
| | 5.2.2.2 b) | Inspection, maintenance and scrapping of valves shall be in accordance with EN 14912 or an other equivalent standard referred to in RID/ADR. (see also 5.5) | | **TC 286**: No longer relevant: sentence deleted to be in accordance with prEN 1440 | |
| | 5.2.2.4 | The test pressure shall be at least the minimum test pressure defined in RID/ADR for the relevant product and the test pressure stamped as part of the operational marks. | | **TC 286** Already modified: (harmonised with in prEN 1440) | |
| | 5.2.3 | Add a new sentence:<br>The requirements of 5.2.2.3 and 5.2.2.4 d) – i) are also applicable for the pneumatic proof test. | | **TC 286:** Partially accepted: proposal for 5.2.2.4 not accepted | |

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| | | | | because it is specific for hydraulic pressure test | |
| | 5.2.3.1. b) | Amend as proposed in 5.2.2.2b) (see also 5.5) | | **TC 286**: See comment n°54 : sentence deleted | |
| | 5.2.3.1.2.1 | Amend as proposed in 5.2.2.2b) (see also 5.5) | | **TC 286:** Partially accepted: proposal for 5.2.2.4 not accepted because it is specific for hydraulic pressure test | |
| | 5.3.2.2 c) | Amend as proposed in 5.2.2.2b) (see also 5.5) | | **TC 286**: See comment n°54 : sentence deleted | |
| | 5.5 | In our opinion the information given in this clause are sufficient so that 5.2.2.2 b), 5.2.3.1 b), 5.3.1.2.1 b) and 5.3.2.2 c) could be deleted. | | **TC 286**: Accepted | |
| | 6.4 | Amend as follows:<br>After successful completion of the periodic inspection, each cylinder shall be legibly and durably marked in accordance with EN 14894 and the requirements of RID/ADR.<br>Note:<br>The marking of cylinders is regulated by RID/ADR which takes precedence over any clause in this European Standard. The European Directive on Transportable Pressure Equipment 2010/35/EU includes additional marking requirements | | **TC 286**: Not accepted: a note is already added in the scope dealing with any precedence of RID/ADR. | |
| | Annex A | Amend "General" as follows:<br>If at the time of the periodic inspection and tests no rejection criteria in Table A.1 and A.2 are available, the values of the tables in EN 1440 have to be used. | | **TC 286**: Rejected: for instance corrosion criteria level has to be different from EN 1440<br>Noted for further revision of the standard | |
| | Annex C | Amend "General" as follows: | | **TC 286**: Noted for | |

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| | | If at the time of the periodic inspection and tests no rejection criteria in Table C.1 are available, all the defects described in Table C.1 will cause the rejection of the receptacle. | | further revision of the standard | |
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Dispatch 3

| **prEN 14595 rev** WI 296084 | | **Tanks for transport of dangerous goods - Service equipment for tanks - Pressure and vacuum breather device** | **Where to refer in RID/ADR:** | **Applicable sub-sections and paragraphs:** | |
|---|---|---|---|---|---|
| No assessment by CEN Consultant provided | | | | | |
| **Comments from members of the Joint Meeting:** | | | | | |
| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG Standards |
| UK | 5.6 | No mention is made of the need for the materials to be compatible with the dangerous goods as required by ADR 6.8.2.2.1 | Add a Note drawing attention to the need for materials to be compatible with the dangerous goods. | | |
| UK | General | Further comment deferred until the CEN Consultant's assessment is available | | | |
| | | | | | |

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

Dispatch 3

| **FprEN ISO/FDIS 17871**<br>WI 023179 | **Gas cylinders - Quick opening valves - Specification and type testing (ISO/DIS 17871:2014)** | **Where to refer in RID/ADR** | **Applicable sub-sections and paragraphs**: |
|---|---|---|---|

No assessment by CEN Consultant provided.

Enquiry draft not discussed by STD's WG

**Comments from members of the Joint Meeting:**

| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG Standards |
|---|---|---|---|---|---|
| UK | General | No deviations from or contradictions with RID/ADR identified. The standard can be referenced subject to the CEN Consultant's positive assessment. | | | |
| CH | | not to be mentioned in RID/ADR | | **TC23 reply:** These valves are used for full pressure receptacles transported by road and rail and therefore should be in RID/ADR. | |
| | | | | | |

| **Decision of the STD's WG:** | Accepted<br>Refused<br>Postponed | Comments<br>DE EN ISO 17871: to be referenced in 6.2.4.1 under "closures", applicable for 6.2.3.1, 6.2.3.3 and 6.2.3.4<br><br>Submission to FV planned 26th March 2015 | No transition regulation required. |
|---|---|---|---|

Dispatch 3

| **FprEN ISO 21029-2**<br>WI 268061 | **Cryogenic vessels - Transportable vacuum insulated vessels of not more than 1 000 litres volume - Part 2: Operational requirements (ISO/DIS 21029-2:2014)** | **Where to refer in RID/ADR** | **Applicable sub-sections and paragraphs**: |
|---|---|---|---|

No assessment by CEN Consultant provided.

| Enquiry draft not discussed by STD's WG | | | | | |
|---|---|---|---|---|---|
| **Comments from members of the Joint Meeting** | | | | | |
| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG Standards |
| UK 1 | 4.2.2 | The Class Hazard label(s), UN Number and Proper Shipping Name required for transport are not mentioned. | Add these transport of dangerous goods requirements. | | |
| UK 2 | 15 | RID/ADR require that pressure relief valves are tested every five years – other checks are at 10 year intervals (See P203 (8)). | Revise this clause. 5 year testing is a requirement for UN pressure receptacles, so it is relevant to ISO too. | | |
| UK 3 | General | It is assumed that this will replace EN 1251-2:2000 which is referenced in 6.2.4.2. A CEN Consultant's positive assessment is needed. | | | |
| CH | | General: not to be referenced in RID/ADR | | | |
| CH | 4.2.2 | Labelling has to be in accordance with the requirements of RID/ADR | | | |
| CH | 10 | Hint to the degree of filling is missing ((P203/5) | | | |
| CH | 15 | Periodic Inspection: P203/8 periodic inspection of pressure relief valves shall not exceed 5 years | | | |
| | | | | | |
| **Decision of the STD's WG:** | Accepted<br>Refused<br>Postponed | Additional comments<br>Formal Vote will close 22nd March 2015 | | | No transition regulation required. |

Dispatch 3

| **FprEN 13953**<br>WI 286142 | **LPG equipment and accessories - Pressure relief valves for transportable refillable cylinders for Liquefied Petroleum Gas (LPG)** | **Where to refer in ADR:** | **Applicable sub-sections and paragraphs**: |
|---|---|---|---|

Assessment by CEN Consultant on 31.12.2014 (Dispatch 2)
Summary of conclusions:
None of the normative references conflicts with the related ADR RID provisions. There is no reason to object to a reference to EN 13953 based on its normative references.
The current version of EN 13953 is not referenced directly in ADR/RID but is included as a normative reference in a number of older standards which are themselves referenced directly in ADR/RID.

Enquiry draft discussed **by STD's WG** in March 2013 with comments; supported for ref. in RID/ADR and in valve std's. (see INF.45)

**Comments from members of the Joint Meeting:**

| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CEN Consultant | Comment from WG Standards |
|---|---|---|---|---|---|
| UK 1 | 3.10, 3.11 | These two definitions are identical, so one must be wrong | | | |
| UK 2 | General | This standard can be referenced under '*for closures*' in 6.2.4.1. | | | |
| CH | General | Not to be referenced in RID/ADR | | | |
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| **Decision of the STD's WG:** | Accepted<br>Refused<br>Postponed | Additional comments<br>DE EN 13953: to be referenced in 6.2.4.1 under "closures", applicable for 6.2.3.1 and 6.2.3.4<br>Standard made already available in March 2015 by CCMC for publication | No transition regulation required. |
|---|---|---|---|

Dispatch 2

| **FprEN 14912**<br>WI 286144 | **LPG equipment and accessories - Inspection and maintenance of LPG cylinder valves at time of periodic inspection of cylinders** | **Where to refer in RID/ADR** | **Applicable sub-sections and paragraphs**: |
|---|---|---|---|

Assessment by CEN Consultant pending.

FV draft (WI 286151) discussed by STD's WG in September 2013 with comments (see INF.22 rev).

| **Comments from members of the Joint Meeting:** | | | | | |
|---|---|---|---|---|---|
| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG Standards |
| UK 1 | General | This standard should be referenced in RID/ADR 6.2.4.2 alongside EN ISO 22434:2006 *Transportable gas cylinders - Inspection and maintenance of cylinder valves*. | | | |
| UK 2 | Foreword | RID is not mentioned as was requested at the review of this standard at the enquiry stage. It should be added to ADR here and in the Bibliography | | | |
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| **Decision of the STD's WG:** | Accepted<br>Refused<br>Postponed | Additional comments<br>DE EN 14912: to be referenced in 6.2.4.1, replacing EN 14912:2005<br><br>Standard made already available in March 2015 by CCMC for publication | No transition regulation required |
|---|---|---|---|

Dispatch 3

| **FprEN 15207:2014**<br>WI 296064 | **Tanks for the transport of dangerous goods - Plug/socket connection and supply characteristics for service equipment in hazardous areas with 24 V nominal supply voltage** | **Where to refer in RID/ADR** | **Applicable sub-sections and paragraphs**: |
|---|---|---|---|

No assessment by CEN Consultant provided.

**Enquiry draft not discussed by STD's WG**

**Comments from members of the Joint Meeting:**

| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG Standards |
|---|---|---|---|---|---|
| UK | General | A non-expert in vehicle wiring makes these comments, but on my reading of Chapter 9.2, this standard does not contradict any technical requirement of ADR. There seems no reason to prevent this version of this standard being used either as an alternative to EN 15207:2006 or replacement with a transition measure in Chapter 1.6. | | **TC 296**: EN 15207:2006 is referred in 9.2.2.6.3 for the electrical connectors between motor vehicles and trailers. This reference should be replaced by EN 15207:2014. | |
| CH | General | Not to be referenced in RID/ADR | | | |
| | | | | | |

| **Decision of the STD's WG:** | Accepted<br>Refused<br>Postponed | Additional comments<br><br>Standard made already available in December 2014 by CCMC for publication | No transition regulation required |
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Dispatch 2

| **FprEN 13094**<br>WI 296066 | **Tanks for the transport of dangerous goods - Metallic tanks with a working pressure not exceeding 0,5 bar - Design and construction** | **Where to refer in RID/ADR 6.8.2.6.1** | **Applicable sub-sections and paragraphs**: **6.8.2.1** |
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Assessed by CEN Consultant on 3.12.2014 (Dispatch 2)

Summary of conclusions

*There are no clauses in FprEN 13094 rev contradicting the provisions of RID/ADR subsection 6.8.2.1 declared as applicable in the existing references and can be approved.*

Follow-up action by the Joint Meetings STD's WG

*This standard needs to be discussed by the STD's WG as an addition to the existing references to EN 13094:2004 and EN 13094:2008+AC:2008 in RID/ADR 6.8.2.6.1, Table, under "For tanks" and related to subsections 6.8.2.1.*

| **Enquiry draft** discussed with comments by STD's WG in September 2013 (see **INF.22 rev**) | | | | | |
|---|---|---|---|---|---|
| **Comments from members of the Joint Meeting:** | | | | | |
| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG Standards |
| UK | 1 | This standard can be referenced, but the Scope needs to be clarified. Notes in standards cannot give requirements, so an editorial correction is required if fixed tanks on rail wagons are confirmed as excluded. Transition dates agreed. | Make text of note 2 normative or delete the note as appropriate. | **TC 296 :** No change from EN 13094:2008 | |
| | | | | | |
| CH | Scope | Amend | If there is any conflict between this standard and the provisions of ADR, the provisions of ADR take precedence. | **TC 296**: This general rule is already in RID/ADR | |
| CH | 3 | Terms and definitions<br>The meaning of the reference to EN ISO 10286 is not clear | | **TC 296**: ? no such reference | |
| CH | 3 | Terms and definitions<br>Definitions in the regulations should not be repeated or reworded e.g. 3.1 battery vehicle, 3.2 cylinder, 3.3 tube, 3.4 bundle of cylinders, 3.18 competent authority | | **TC 296**: ? no such 3.1, 3.2, 3.3 and 3.4.<br>No change in 3.1.3 Competent authority from EN 13094:2008 | |
| CH | 3 | Inspector<br>Use the same expression as proposed in EN 12972:2014 | Expert<br>individual or body approved by the competent authority to perform designated inspections and tests<br>NOTE 1 to entry: According to RID/ADR testing, inspection and certification duties are allocated to either the | **TC 296**: No such definition | |

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| | | | competent authority or to inspection bodies or experts approved by the competent authority. RID and ADR include detailed requirements on the qualification, obligations, accreditation and approval of these inspection bodies. | | |
| CH | 6.3 | Battery vehicle filling identification<br>Amend the note | NOTE At time of publication of this document, marking requirements for battery vehicles can be found in Chapter 6.8.3.5.10 and 6.8.3.5.11 ADR | **TC 296**: ? 6.3 deals with the requirements for shells of non-circular cross section | |
| CH | 8.2 | Documentation<br>Add a reference to ADR (tank record) | NOTE At time of publication of this document, requirements for tank records can be found in Chapter 4.3.2.1.7 ADR | **TC 296**: ? No 8.2 | |
| | | | | | |

| **Decision of the STD's WG:** | Accepted<br>Refused<br>Postponed | Additional comments | Proposed transition regulation | Applicable for new type approvals or for renewals | Latest date for withdrawal of existing type approvals |
|---|---|---|---|---|---|
| | | Standard will be made available on 1st April 2015 by CCMC for publication | EN 13094:2004 | [Between 1 January 2005 and 31 December 2009] | |
| | | | EN 13094:2004 + AC:2008 | [Between 1 January 2010 and 31 December 2016] | |
| | | | EN 13094 :2014 | Until further notice | |

| **FprEN 12972:2014**<br>WI 296067 | **Tanks for transport of dangerous goods - Testing, inspection and marking of metallic tanks** | **Where to refer in RID/ADR 6.8.2.6.2** | **Applicable sub-sections and paragraphs: 6.8.2.4 and 6.8.3.4** |
|---|---|---|---|

First submission assessment by CEN Consultant on 20.7.2013.

Summary of conclusions

*Major amendments are needed to align the standard with RID/ADR and to cover all regulations declared as applicable. A series of other deficiencies of editorial, technical and general nature have been detected and need to be addressed for the preparation of the FV text. Details are given in the Annex to this assessment.*

Follow-up action by the Joint Meetings STD's WG

*This standard needs to be discussed by the STD's WG as a replacement of the existing reference to EN 12972:2007 in RID/ADR 6.8.2.6.2 and related to subsections 6.8.2.4 and 6.8.3.4.*

**Enquiry draft discussed with comments by STD's WG** in September 2012 (see **INF.38**)

**Comments from members of the Joint Meeting:**

| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG Standards |
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| CH | general | As there is a meeting of WG 5 in Berlin (13.03.2015) concerning the different views (including Doc ECE-TRANS-WP15-AC1-2015-15e UK) and the outstanding "additional proposals" by UK, we request to postpone the discussion on how to proceed with this reviewed standard until the September session. Nevertheless we would like to point to the possibility to make some restriction for the use in column 1 or 3 of the table in 6.8.2.6.1 | | It is proposed to postpone the discussions to the next RID/ADR session on this standard | |
| | | | | | |
| UK1 | 3.2 | Misuse of the term "expert" which replaces the term "inspector" throughout the document, changes the definition of terms used in ADR / RID<br>The term 'expert' is not defined within ADR or any Standard | Delete Definition of 'Expert'<br>Whole document<br>Revert back to 'Inspector' as EN 12972:2007 version | | |
| UK 2 | 4.2.1 | ADR 6.8.2.3.4 | add reference number to new | | |

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| | 2nd Paara. | Modifications to tank design for type approval is not sufficiently detailed; new text to be added to 4.2.2.2; 5.2.5 to be amended | sub-clause | | |
| UK 3 | 4.2.2.2 | ADR 6.8.2.3.4<br>Modifications to tank design approval is not sufficiently detailed | add new text:<br>The inspection for type approval in the case of a modification of a tank with a valid, expired or withdrawn type approval, the testing, inspection and approval are limited to the parts of the tank that have been modified. The modification shall meet the provisions of ADR applicable at the time of the modification. For all parts of the tank not affected by the modification, the documentation of the initial type approval remains valid. | | |
| UK 4 | 4.3.1 | Add Vacuum Test to the required sub-clause<br>6.7.4.14.4 Refrigerated Liquefied Gases – Portable Tanks<br>6.8.3.4.7 Class 2 LPG - Fixed Tanks (Tank-Vehicles), Demountable Tanks and Tank-Containers And Tank Swap Bodies<br>6.10.2.2 Vacuum Operated Waste Tanks | - vacuum test (see 5.7, only if required and if no calculation or FE-analysis has been provided) | | |
| UK 5 | 4.4.1 | Add Vacuum Test to the required sub-clause<br>6.7.4.14.4 Refrigerated Liquefied Gases – Portable Tanks<br>6.8.3.4.7 Class 2 LPG - Fixed Tanks (Tank-Vehicles), Demountable Tanks and Tank-Containers And Tank Swap Bodies<br>6.10.2.2 Vacuum Operated Waste Tanks | - vacuum test (see 5.7, only if required and if no calculation or FE-analysis has been provided) | | |
| UK 6 | 4.5.1 | Add Vacuum Test to the required sub- | - vacuum test (see 5.7, only if | | |

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| | | clause<br>6.10.2.2 Vacuum Operated Waste Tanks | required and if no calculation or FE-analysis has been provided) | | |
| UK 7 | 4.6.1 | Add Vacuum Test to the required sub-clause<br>6.7.4.14.4 Refrigerated Liquefied Gases – Portable Tanks<br>6.8.3.4.7 Class 2 LPG - Fixed Tanks (Tank-Vehicles), Demountable Tanks and Tank-Containers And Tank Swap Bodies<br>6.10.2.2 Vacuum Operated Waste Tanks | - vacuum test (see 5.7, only if required and if no calculation or FE-analysis has been provided) | | |
| UK 8 | 4.6.1 | Is prescriptive; " .. shall be carried out .."; ADR 6.8.2.4.4 allows that the exceptional check may be performed fulfilling a Periodic or Intermediate test. Therefore not all the 9 requirements listed are applicable to an Intermediate test | Amend text | | |
| UK 9 | 4.6.2 | A wider definition of repair that includes the "replacement" of devices and equipment defined in ADR / RID as "service equipment" | | | |
| UK 10 | 4.6.3 | Is prescriptive; ".. shall be carried out .."; ADR 6.8.2.4.4 allows that the exceptional check may be performed fulfilling a Periodic or Intermediate test. Therefore not all the requirements listed are applicable to an Intermediate test | Amend text | | |
| UK 11 | 5.2.2.2 | The purpose of the examination of documents is not made clear and the user of the standard is given no advice or guidance | Add / Amend text | | |
| UK 12 | 5.2.5 | ADR 6.8.2.3.4: Modifications to tank design approval is not sufficiently detailed | add sub-clause and new text: The inspection for type approval in the case of a modification of a tank, are limited to the parts of the tank that have been modified. The modification shall meet the | | |

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| | | | provisions of ADR applicable at the time of the modification. For all parts of the tank not affected by the modification, the documentation of the initial type approval remains valid. | | |
| UK 13 | 5.3.1 | ADR 6.8.2.3.4: Modifications to tank design approval is not sufficiently detailed | add sub-clause and new text: The inspection for type approval in the case of a modification of a tank, are limited to the parts of the tank that have been modified. The modification shall meet the provisions of ADR applicable at the time of the modification. For all parts of the tank not affected by the modification, the documentation of the initial type approval remains valid. | | |
| UK 14 | 5.3.6 | ADR 6.7.3.15.3 and 6.7.4.14.3: Require "..*All welds subject to full stress level in the shell shall be inspected during the initial test by (NDT) ..."* | Amend text | | |
| UK 15 | 5.3.6 | ADR 6.7.3.15.3 and 6.7.4.14.3<br>Allows that the NDT testing does not apply to the jacket; this is not detailed | Omission; add new text | | |
| UK 16 | 5.3.6.2,<br>5.3.6.3,<br>5.3.6.4 | ADR 6.8.2.1.23 requires:<br>$\lambda = 0.8$: the weld beads shall so far as possible be inspected visually on both faces and shall be subjected to a non-destructive spot check.<br>All weld "Tee" junctions with the total length of weld examined to be not less than 10% of the sum of the length of all longitudinal, circumferential and radial (in the tank ends) welds shall be tested; | Amend text | | |

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| | | λ = 0.9: all longitudinal beads throughout their length, all connections, 25% of circular beads, and welds for the assembly of large-diameter items of equipment shall be subjected to non-destructive checks. Beads shall be checked visually on both sides as far as possible; | Amend text | | |
| | | λ = 1: all beads shall be subjected to non-destructive checks and shall so far as possible be inspected visually on both sides. A weld test-piece shall be taken | Amend text | | |
| UK 17 | 5.4 | 6.10.3.6 Vacuum Operated Waste tanks May include an internal piston discharge facility; requires inspection | New 5.4.3 clause | | |
| UK 18 | 5.4 | 6.10.3.5 Vacuum Operated Waste tanks May include openable ends and securing attachments; requires inspection | Omission; add new 5.4.3 clause | | |
| UK 19 | 5.4 | 6.10.3.7 Vacuum Operated Waste tanks May include a suction boom; requires inspection | Omission; add new 5.4.4 clause | | |
| UK 20 | 5.4 | 6.10.3.8 (f) Vacuum Operated Waste tanks May include sight glasses and isolation valves; requires inspection | Omission; add new 5.4.5 clause | | |
| UK 21 | 5.5.4 | ADR 6.8.2.1.27 does not specify a maximum continuity level, however EN12972:2007 required "… shall not exceed 10 Ω" | Requirement of "… shall not exceed 10 Ω" to be reinstated | | |
| UK 22 | 5.6.1 | To avoid risk of freezing, the temperature of the water during the test should be not less than 7 °C<br>EN12493+A1:2014 – Annex K.3 | Amend text | | |
| UK 23 | 5.6.2 | 6.7.2.19.3 For Portable Tanks Class 1 and Class 3 to 9,<br>6.3.7.15.3 Non-refrigerated Liquefied Gases, | Omission; add new text | | |

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| | | 6.7.4.14.3 Refrigerated Liquefied Gases,<br>**Initial hydraulic test:** when the tank and its fittings have been tested separately; they shall be subject, together, to Leakproofness test after assembly see EN12252:2014 – 10.3.1 | | | |
| UK 24 | 5.6 | 6.7.2.19.4 For Portable Tanks Class 1 and Class 3 to 9<br>the Periodic hydraulic test (for solid, non-toxic or corrosive substances) may be replaced by a pressure test at 1.5 times MAWP | Omission; add new text | | |
| UK 25 | 5.6.2 | 6.7.2.19.4 For Portable Tanks Class 1 and Class 3 to 9 (liquid)<br>And 6.7.3.15.4 Non-Refrigerated Liquefied Gases,<br>**Periodic hydraulic test:** when the tank and its fittings have been tested separately; they shall be subject, together, to Leakproofness test after re-assembly see EN12252:2014 – 10.3.1 | Omission; add new text | | |
| UK 26 | 5.6.2 | 6.7.4.14.4 For Refrigerated Liquefied Gases the Periodic hydraulic test, shall be replaced by a Leakproofness test and vacuum reading see EN13530-2:2002 - 6.5.1 | Omission; add new text | | |
| UK 27 | 5.6 | ADR 6.8.3.4.7: In the case of vacuum-insulated tanks, the hydraulic-pressure test and the check of the internal condition may, with the consent of the approved expert, be replaced by a leakproofness test and measurement of the vacuum<br>The substitution of a Leakproofness test for Powder / Granular tanks is detailed in 5.6.1; for consistency this option for LPG tanks should also be detailed | Omission; add new text | | |

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| UK 28 | 5.6.2, 3rd paragraph | The definition of 'Service Equipment' in ADR 1.2 does not include pump and/or flow meters including gas extractor. For tanks, it states<br>*"Of the tank means filling and discharge, breather, safety heating, heat insulating and additive devices and measuring instruments;"*<br>Therefore Pump / Metering systems are: outside the scope of the definition of 'Service Equipment' of ADR Chapter 1.2;<br>In addition:<br>- there are no EN Standards for such equipment;<br>- there a no defined test requirements detailed in the Draft FprEN 12972;<br>- there are no test procedures in the draft<br>- the test pressure is related to the test pressure of the tank.. Pressure developed by pumps or external sources is not considered.<br>- specially for low pressure tanks with complex piping systems the costs for evacuation water is costly while there are no benefits for safety when testing 5mm thick piping at 0.4 bar.<br>- pumps and metering devices are included but the connection pipework is not, this will means complete disassembly and separate testing. This will have consequences for reliability and safety. This provision is contra-effective.<br>- vapour recovery and air pressurisation lines can also be seen as service equipment. Filling these with water for testing and drying after testing is costly and there is no additional benefit for safety. The design pressure for air pressure lines can be lower than the test pressure for the tank itself. | This section requires removal and to revert back to the original statements in EN 12972 : 2007 and N0308 Draft version<br>"*All service equipment and the whole piping system with the exception of breather devices, safety valves and bursting discs shall be included in the hydraulic pressure test.*"<br><br>Delete the 3rd paragraph of sub-clause 5.6.2 | | |

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| UK 29 | 5.6.3.2 | Contradicts ADR 6.8.2.4.1 (para 5) and EN 13094:2008 6.5.2<br>*The test shall be carried out on each compartment at a pressure at least equal to 1.3 times the maximum working pressure*<br>*Except for tanks for inter-modal tanks, compartments of compartmented tanks shall be designed to withstand a test pressure which subjects all parts of a compartment to a pressure at least equal to 1,3 x ($P_{ts}$ + the liquid head of the most dense substance to be carried)*<br>*The test pressure shall be related to the highest point of the compartment.* | Revert to EN 12972:2007 text | | |
| UK 30 | 5.6.4 | 6.7.3.15.3 For Non-Refrigerated Liquefied Gases<br>6.8.3.4.7 Class 2 Tanks<br>the Initial hydraulic test "… *may be replaced .. by using another liquid or gas …* "<br>Alternative gases are likely to have a flash point above 61 $^{o}$C<br>LPG gases are likely to be flammable therefore cannot be used (5.6.4 – 4th para) | Omission; add new sub-clause and text | | |
| UK 31 | 5.6 | For LPG road tanks see EN12252:2014 – 10.2.1<br>*On completion of construction, road tanker pipework shall be subjected to a hydraulic pressure test at a test pressure of 1,3 times the design pressure specified in the pipework design document or 1,3 times the test pressure of the pressure vessel, whichever is the greatest* | Omission; add new sub-clause and text | | |

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| UK 32 | 5.6.4 | The test as specified in the standard seems to be more extensive than necessary. The tests are more applicable for static tanks that are designed with a much smaller safety margin than tanks for transport of dangerous goods.<br>As a result the costs for performing these test are unnecessary high | Redraft 5.6 completely taking into account the risks of failure of a transport tank. | | |
| UK 33 | 5.6.4, 3rd paragraph plus indents | Limitations are specified for test fluids which do not exist in ADR and in effect it will be completely meaningless because 1.1.5 (ADR) clearly states that where there is a conflict between a standard and RID the latter takes precedence.<br>The use of water for testing aircraft refuelling tankers could lead to fuel contamination. | Delete sub clause 5.6.4Test fluid | | |
| UK 34 | 5.6.4, 3rd paragraph plus indents | Extensive changes that are flawed, increase burdens and reduce effectiveness have been made to the hydraulic pressure test without justification, and include new restrictions on the use of gas that are contrary to the provisions in ADR / RID | | | |
| UK 35 | 5.6.4, 3rd paragraph plus indents | ADR 6.8.2.4.1 and 6.8.2.4.2 *Note* [10]<br>Allows "*In special cases and with the agreement of the expert approved by the competent authority, the hydraulic pressure test may be replaced by a pressure test using another liquid or gas, where such an operation does not present any danger"*<br>The new proposed sub-clause is to ensure that the Competent Authority has approved the expert for the use of other liquids (including gases) and that an individual expert cannot make the determination to use | New Sub-clause; change text:<br>**5.6.4.1 General**<br>The fluid normally used for hydraulic pressure testing shall be water.<br>Other liquids may be used with agreement of the expert only in special cases by an inspection body whose methods and procedures have been evaluated and approved by an | | |

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| | | alternative liquids or gas without completing the approval process | independent expert appointed by the Competent Authority. The Inspection Body may only use these special case methods after receiving authorisation for their use from the Competent Authority, and with agreement of the expert.<br>New sub-clause; change text:<br>**5.6.4.2 Special Cases for the use of Alternative Liquids**<br>Alternative Liquids, including gases, may be used for pressure testing only in special cases by inspection bodies that have been authorised for the use of their methods and procedures by the Competent Authority and with agreement of the expert (see 5.6.4.1). | | |
| UK 36 | 5.6.5.1 | We are not convinced that the advice given is correct to ensure safe working and could lead readers to believe that by following these requirements they were operating an appropriate system of work when they were not. | Restrict this normative text to warning of the dangers and the need for a thorough risk assessment. Move the advice to an informative annex and improve the advice as appropriate. The need to respect any national regulations should also be mentioned. | | |
| UK 37 | 5.6.5.2, 2nd indent | The level of radiography included in this proposal represents an increase of 500% above that required when the vessel was originally manufactured.<br>Additional radiography should only be a | Reword 2nd indent<br>- additional non-destructive testing shall be carried out in accordance with 5.3.6 only if surface defects are | | |

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| | | requirement if the internal and external visual inspection identifies defects. If during the internal and external inspections the appraisals raise concerns regarding the condition of the tank, then the hydraulic test will not be carried out until these concerns have been investigated and addressed.<br>If repairs are required, the inspection would then revert to an Exceptional Inspection (4.6.1 / 4.6.3 / 4.6.4) which already includes: - *check of the design characteristics (see 5.3)*<br>When testing with a gas, additional provisions apply which is so strict that the can hardly be used on any tank.<br>- "any part hiding a possible defect" means even if the slightest corrosion or scratch can be expected the whole shell shall be uncovered including structural equipment and coupler plate of a semi-trailer, effectively destroying the tank.<br>- if a tank is designed around a weld efficiency factor of 0.8 first more NDT needs to be performed. Testing with gas in situations where cleaning is difficult film cannot be attached to the inside.<br>- "Any bolts or studs with worn or damaged treads shall be replaced" means that you have to unbolt any connection to check if treads are damaged leading to unnecessary costs and reliability problems. | identified or the tank shows indications of a reduction of the wall thickness. If additional non-destructive testing is required it shall be carried out at least to the amount of the weld efficiency factor used for the manufacture of the tank but not less than 0,8 and testing with alternative liquids or gas is not permitted.<br>Delete sub clause 5.6.5.2 | | |
| UK 38 | 5.7 | 6.7.4.14.4 For Refrigerated Liquefied Gases<br>And 6.8.3.4.7 Class 2 Tanks<br>The method of performing a vacuum reading on vacuum insulated tanks requires detailing | Omission; add new text | | |

<table>
<tr><td>UK 39</td><td>5.7.1</td><td colspan="5">An optional test pressure that may not be appropriate has been introduced for vacuum testing without justification<br>Should include details for each type of vessel: 6.7 / 6.8 / 6.10</td><td>Omission; add new text</td><td></td><td></td></tr>
<tr><td rowspan="9">UK 40</td><td>5.8, Table 2</td><td colspan="5">Test pressures for Leakproofness Test</td><td></td><td></td><td></td></tr>
<tr><td></td><td>Line</td><td>Standard</td><td>ADR</td><td>Gas</td><td>Liq’d</td><td></td><td></td><td></td></tr>
<tr><td></td><td>1</td><td>13094 / 14025</td><td>6.8 / 6.10</td><td>X</td><td>✓</td><td></td><td></td><td></td></tr>
<tr><td></td><td>2</td><td>13094 / 14025</td><td>6.8 / 6.10</td><td>✓</td><td>X</td><td></td><td></td><td></td></tr>
<tr><td></td><td>3</td><td>Class 2 LPG</td><td>6.7</td><td>✓</td><td>✓</td><td></td><td></td><td></td></tr>
<tr><td></td><td>4</td><td>Class 2 Cryo</td><td>6.7</td><td>✓</td><td>X</td><td></td><td></td><td></td></tr>
<tr><td></td><td>5</td><td>Class 2 Cryo</td><td>6.7 / 6.8.3</td><td>✓</td><td>✓</td><td></td><td></td><td></td></tr>
<tr><td>Line 4</td><td colspan="5">6.7.2.1 Class 1 and Class 3 to 9 - Portable Tanks;<br>means a Leakproofness test using gas<br>Correct (if MEGCs are not within scope)</td><td></td><td></td><td></td></tr>
<tr><td>Line 4</td><td colspan="5">6.7.3.1 Non-Refrigerated Gases - Portable Tanks:<br>means a Leakproofness test using gas<br>6.7.3.15.3 allows the use of a Liquid for initial hydraulic test but 6.7.3.15.4 Periodic does not?<br>One of these lines (4 or 5) requires amending to be consistent with the other (see below)</td><td>Not consistent with Line 5 below</td><td></td><td></td></tr>
<tr><td>Line 5</td><td colspan="5">6.7.4.1 Refrigerated Gases - Portable Tanks:</td><td></td><td></td><td></td></tr>
</table>

| | | | | | |
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| | | means a Leakproofness test using gas<br>6.7.4.14.3 allows the use of a Liquid for initial hydraulic test but 6.7.4.14.4 Periodic does not?<br>One of these lines (4 or 5) requires amending to be consistent with the other; if Line 5 is changed to NO Liquids, then another Line will have to be added as 6.8.3 tank Leakproof fluids are not specified<br>If a Vacuum Insulated tank, a Vacuum reading is required (see No 38 - 5.7 above) | Not consistent with Line 4 above<br><br>Omission; add new text | | |
| UK 41 | 5.8 | Cryogenic Vessels – Vacuum Insulated: EN13530-2: 2002 - 6.1.2<br>leakproofness tests by ensuring the integrity of vacuum, and leak testing of external piping when it is connected to the inner vessel | Omission; add new text | | |
| UK 42 | 5.8 | Cryogenic Vessels – Vacuum Insulated: EN13530-2: 2002 - 6.1.2<br>leak test of external piping | Omission; add new text | | |
| UK 43 | 5.8 | ADR 6.8.2.4.2 3rd Para: In the case of tanks intended for the carriage of powdery or granular substances, and with the agreement of the expert approved by the competent authority, the periodic hydraulic pressure tests may be omitted and replaced by leakproofness tests in accordance with 6.8.2.4.3, at an effective internal pressure at least equal to the maximum working pressure<br>If Powder / Granular tanks are 'hydraulically' tested to Table 2 they will be tested at less than MWP | Include a new sub-clause specifying substituted Leakproofness tests in lieu of hydraulic | | |
| UK 44 | 5.8.7.1 | ADR 6.8.2.4.3 - 5th para: For tanks | Add indent | | |

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| | | equipped with breather devices and a safety device to prevent the contents spilling out if the tank new overturns, the pressure test shall be equal to the static pressure of the filling substance. | | | |
| UK 45 | 5.8.7.2 | 6.10.3.9 Vacuum Operated Waste tanks<br>May include Pressure Gauge; requires inspection | New indent | | |
| UK 46 | 5.10.3 | LPG road tanker discharge hose with their couplings shall be tested to a pressure of 1,5 times its design pressure see EN12252:2014 – 8.6.5 | Omission; add new text | | |
| UK 47 | 5.10 | Cryogenic Vessels – Vacuum Insulated: EN13530-2: 2002 - 4.2.3.11 (a)<br>Piping including valves shall be subjected to a pneumatic pressure test: not less than the allowable working pressure plus 1 bar for piping inside the vacuum jacket | Omission; add new text | | |
| UK 48 | 5.13.3 | Normative provisions for tank plates are incompatible with requirements already set out in ADR / RID (Annex E and Annex F) | | | |
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| **Decision of the STD's WG:** | Accepted<br>Refused<br>Postponed | Additional comments<br>Standard made already available in February 2015 by CCMC for publication | No transition regulation required |

## C. Standards at Stage 4: Published standards

Dispatch 2

| **EN 16509:2014**<br>WI 023165 | **Transportable gas cylinders - Non-refillable, small transportable, steel cylinders of capacities up to and including 120 ml 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: 6.2.6.1.5 and 6.2.6.3** |
|---|---|---|---|

FV draft 2013-11-19 assessed by CEN Consultant on 13.1.2014, corr. 17.1.2014 (Dispatch 2)

*Summary of conclusions*

*There are a few non- compliances with the preliminary text of RID/ADR 2015 which render the FV draft unacceptable for approval and an unrestricted reference in RID/ADR.*

*Follow-up action by the Joint Meetings STD's WG*

*This standard needs to be discussed by the STD's WG as an additional entry to RID/ADR 6.2.6.4*

FV draft discussed and postponed by STD's WG in March 2014 (see INF.20)

**Comments from members of the Joint Meeting:**

| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG Standards |
|---|---|---|---|---|---|
| UK | | The non-compliances detected by the CEN Consultant and the editorial suggestions have been resolved in the published version. Changes are shown below. | The standard can be referenced in 6.2.6.4 as a third indent. | | |
| | | **Consultant's suggestion/observation** | **Content of published standard** | | |
| | 4.2.2 | Add working pressure to the design specification | Working pressure has no meaning for liquefied gases so it is better to use design pressure only. Design pressure is the pressure used in the proof pressure test. | | |
| | 4.5 5th para. | Add 'The working pressure shall not exceed two thirds of the test pressure.' | This is the final sentence of this paragraph. | | |
| | 5.2.1 | The Consultant observed: '… the hydraulic pressure test to be carried out on at least five receptacles, whereas the standard requires only one sample to be taken.' | Clause 6.2 requires that each of the tests of clause 5 be carried out on a minimum of 5 cylinders | | |
| | 5.8 | The term "gross weight" isn't compliant with | Gross mass is used in this clause | | |

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| | | RID/ADR where “gross mass” is used. | | | |
| | 7 | The numbering of the reference to the opening force check doesn’t fit. Replace by 5.9 | The reference has been changed to 5.9 | | |
| CH | 3.9 | batch<br>quantity of completed and pressure tested cylinder shells/ compact cylinders made **consecutively** by the same manufacturer using the same manufacturing techniques, to the same design, size and material specifications using the same heat treatment conditions (when applicable) | **Consecutively** has to be defined either by a number of pieces or by time otherwise a batch could be the production over a period of years or several millions of pieces | **TC23 reply:** This not a non-conformity with RID/ADR. The frequency of batch testing is determined in clause 7 so safety is not compromised if very large batches are specified. It would just make product recall more costly.<br>**ECMA:** The term “batch” is only used in clause “7. Batch tests” and there it is clearly specified which number of pieces or time period have to be applied for the different tests. Consequently a change of the standard is not necessary. | |
| CH | 3 | The definition of the inspector should be put into 3 not and not hidden in 4.1 (requirements/general) | | **TC23 reply:** This is not a definition; it is merely a statement of fact.<br>**ECMA:** In other EN- or ISO standards this term is also not defined in the definition section. Consequently a change of the standard is not necessary. | |
| CH | 5.4 | Proof pressure test: The intention of this test is not clear. Shall it be a replacement of the hot water bath | | **TC23 reply:** The leakproofness test is | |

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| | | test? Then it should be mentioned as an alternative method → 5.7.3? | | also required on every cylinder. The test in 5.4 is a hydraulic proof pressure test carried out with a gas on every cylinder – see Clause 9.<br>**ECMA:** The hot water bath test is a combined test for both, leakage and test pressure. In 5.4 it is clearly said that the proof pressure test is not required if the hot water bath test is performed. If an alternative leakage test as described in 5.7.3 is performed, the proof pressure test shall be performed according to 5.4 in addition. Consequently a change of the standard is not necessary. | |
| CH | 5.7 | Alternative methods: RID/ADR 6.2.6.3.2. requires the approval by the competent authority and a special quality system for alternative methods.<br><br>If you use the method describe in 5.7.3 will the whole production be stored for 14 days and than each cylinder weighted again an compared with its previous weight? | | **TC23 reply:** Para. 1; Competent authority approval is covered by the note in 5.7.3.<br>Para 2; Yes; this is what the method in this example requires.<br>**ECMA:** The "NOTE" in 5.7.3 refers to this circumstance.<br><br>The example below the NOTE of 5.7.3 shows only one method for establishing the leakage | |

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| | | | | rate. Other methods are allowed too provided the Competent Authority agrees. Consequently a change of the standard is not necessary. | |
| CH | 7 | Batch test: the manufacturing process shall be subject to a survey by the Xa body an carry out tests required in 6.2.6<br>These two requirements are missing in the standard | | **TC23 reply:** The standard correctly identifies the tests to be done, but does not specify who does them because this is a matter of law not technology. CEN discourages the specification of who carries out conformity assessment<br>**ECMA:** This is subject of the regulation and need not to be specified in the standard. Consequently a change of the standard is not necessary. | |
| CH | 9 | The requirement for the marking does not fully correspond with the required markings mentioned in RID/ADR 1.8.8.4.1e :<br>*Affix a durable and legible mark identifying the type of gas cartridge, the applicant and the date of production or batch number; where due to limited available space the mark cannot be fully applied to the body of the gas cartridge, he shall affix a durable tag with this information to the gas cartridge or place it together with a gas cartridge in an inner packaging.* | **TC23 reply continued**: The standard is written around type approval which requires conformity assessment according to 1.8.7, therefore 1.8.8 requirements do not apply. Also, since these articles contain less than 120 ml of Class 2.2 gas, they are only subject to the marking | **TC23 reply:** all the required information is on the cylinder except when the volume is less than 10ml. when gas type and manufacturer only are shown. But all information is shown on the outer packaging. We do not understand the reference to an inner packaging since the cylinder is the inner | |

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| | | | requirements of 3.4. | packaging; maybe intermediate packaging is intended.<br>**ECMA**: This standard is foreseen to cover only the provisions of Chapter 6.2. "REQUIREMENTS FOR THE CONSTRUCTION AND TESTING OF ...." and not of 1.8.8.4.1 Consequently a change of the standard is not necessary. | |
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| **Decision of the STD's WG:** | Accepted<br>Refused<br>Postponed | Additional comments-<br>DE: EN 16509: to be referenced in 6.2.6.4 only<br><br>ECMA propose the following addition to the end of 6.2.6.4:<br>- for small receptacles containing gas (gas cartridges) containing non-toxic, non-flammable compressed or liquefied gases: EN16509:2014 Transportable gas cylinders – Non-refillable, small transportable, steel cylinders of capacities up to and including 120 ml containing..... | | | No transition regulation required |

Dispatch 3

| **EN 12252:2014** WI 286155 | **LPG Equipment and accessories – Equipping of LPG road tankers** | **Where to refer in RID/ADR** | **Applicable sub-sections and paragraphs**: |
|---|---|---|---|
| No assessment by CEN Consultant provided | | | |
| Enquiry draft not discussed by STD's WG. | | | |
| **Comments from members of the Joint Meeting:** | | | |

| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG Standards |
|---|---|---|---|---|---|
| UK | General | Having checked the standard against the comments by the Standards WG and Consultant on previous versions of this standard, there seems no reason refuse this standard a reference in RID/ADR, subject to a final positive assessment by the CEN Consultant. | | | |
| UK | Transition dates | The dates in Column 4 for the 2005 version shall be "Between 1 January 2009 and 31 December 2018". For this standard Column 4 shall be "Until further Notice" and column 5 "31 December 2018" | | | |
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| **Decision of the STD's WG:** | Accepted<br>Refused<br>Postponed | Additional comments | No transition regulation required |
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Dispatch 3

| **EN 16522:2014** WI 296076 | **Tanks for transport of dangerous goods - Service equipment for tanks - Flame arresters for breather devices** | **Where to refer in RID/ADR 6.8.2.6.1** | **Applicable sub-sections and paragraphs**: |
|---|---|---|---|
| No assessment by CEN Consultant provided | | | |
| Enquiry draft not discussed by STD's WG. | | | |
| **Comments from members of the Joint Meeting:** | | | |

| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG |
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| | | | | | Standards |
| UK | General | The standard has responded to the comments made at its previous review in September 2013. It does not contradict ADR, but is so limited in content that it is questionable if it merits inclusion in the ADR.<br>The Standards WG suggested incorporating the information in the ADR. | Another solution would be to add Table 1 to an Appendix in EN 16852:2010 and withdraw this standard. | | |
| CH | General | At the time not ready for RID/ADR.<br>We are in general of the meaning, that this standard should not necessarily be mentioned in RID/ADR | | | |
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| **Decision of the STD's WG:** | Accepted<br>Refused<br>Postponed | Additional comments | No transition regulation required |

Dispatch 3

| **EN 14432:2014**<br>WI 296069 | **Tanks for the transport of dangerous goods - Tank equipment for the transport of liquid chemicals and liquefied gases - Product discharge and air inlet valves** | **Where to refer in RID/ADR 6.8.2.6.1** | **Applicable sub-sections and paragraphs**: **6.8.2.2.1, 6.8.2.2.2 and 6.8.2.3.1.** |
|---|---|---|---|
| No assessment by CEN Consultant provided | | | |
| Enquiry draft discussed with comments by STD's WG in September 2013 (see INF.22 rev) | | | |
| **Comments from members of the Joint Meeting:** | | | |

| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG Standards |
|---|---|---|---|---|---|
| UK | General | Having checked the last comments from the Standards WG (Sept. 2013), there seems no reason refuse this standard a reference in RID/ADR, subject to a final assessment by the CEN Consultant. | | | |
| | Transition dates | Since we are dealing with references in the 2017 regulations, the final date for new type approvals should be 31 December 2018. The preceding version first appeared in RID/ADR 1 January 2009 | | | |

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| | | Column 4 should read "Between 1 January 2009 and 31 December 2018. No need for a date in column 5. | | | |
| DE | General | Scope of the standards – Sometimes these standards are also used for tanks with a working pressure less than 50 kPa (voluntary). Is there a possibility to allow the application of these standards also for tanks with a working pressure less than 50 kPa regarding to the new head lines of the table in 6.8.2.6.1 RID/ADR 2017? | | | |

| **Decision of the STD's WG:** | Accepted<br>Refused<br>Postponed | Additional comments | Proposed transition regulation | Applicable for new type approvals or for renewals | Latest date for withdrawal of existing type approvals |
|---|---|---|---|---|---|
| | | | EN 14432:2006 | [Between 1 January 2006 and 31 December 2016] | |
| | | | EN 14432:2014 | Until further notice | |

Dispatch 3

| **EN 14433:2014**<br>WI 296080 | **Tanks for the transport of dangerous goods - Tank equipment for the transport of liquid chemicals and liquefied gases - Foot valves** | **Where to refer in RID/ADR 6.8.2.6.1** | **Applicable sub-sections and paragraphs**: **6.8.2.2.1, 6.8.2.2.2 and 6.8.2.3.1** |
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No assessment by CEN Consultant provided.

Enquiry draft discussed with comments by STD's WG in September 2013 (see INF.22 rev)

**Comments from members of the Joint Meeting:**

| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CCMC | Comment from WG Standards |
|---|---|---|---|---|---|
| UK | General | Having checked the last comments from the Standards WG (Sept. 2013), there seems no reason refuse this standard a reference in RID/ADR, subject to a final assessment by the CEN Consultant. | | | |

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|---|---|---|---|---|---|
| | Transition dates | Since we are dealing with references in the 2017 regulations, the final date for new type approvals should be 31 December 2018. The preceding version first appeared in RID/ADR 1 January 2009 Column 4 should read "Between 1 January 2009 and 31 December 2018. No need for a date in column 5. | | | |
| DE | General | Scope of the standards – Sometimes these standards are also used for tanks with a working pressure less than 50 kPa (voluntary). Is there a possibility to allow the application of these standards also for tanks with a working pressure less than 50 kPa regarding to the new head lines of the table in 6.8.2.6.1 RID/ADR 2017? | | | |

| **Decision of the STD's WG:** | Accepted<br>Refused<br>Postponed | Additional comments | Proposed transition regulation | Applicable for new type approvals or for renewals | Latest date for withdrawal of existing type approvals |
|---|---|---|---|---|---|
| | | | EN 14433:2006 | [Between 1 January 2006 and 31 December 2016] | |
| | | | EN 14433:2014 | Until further notice | |