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**Economic Commission for Europe****Inland Transport Committee****Working Party on the Transport of Dangerous Goods****Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods**

Geneva, 15-25 September 2015

Item 3 (b) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:  
new proposals****Amendment of the provisions relating to gas cartridges in  
6.2.6.4****Transmitted by the European Cylinder Makers Association (ECMA)<sup>1, 2</sup>***Summary*

- Executive summary:** The aim of this proposal is to amend the marking requirements of EN16509 so that these are consistent with the requirements of RID/ADR.
- Action to be taken:** Amend the proposed text of 6.2.6.4 agreed at the spring 2015 session of the Joint Meeting to clarify the deviation of marking requirements of EN 16509 from 1.8.8.4.1 (e).
- Reference documents:** ECE/TRANS/WP.15/AC.1/138, paragraph 20 and Annex II Informal document of the spring 2015 session INF.48.

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<sup>1</sup> In accordance with the programme of work of the Inland Transport Committee for 2014–2015 (ECE/TRANS/240, para. 100, ECE/TRANS/2014/23, cluster 9, para.9.2).

<sup>2</sup> Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2015/49.

## Introduction

1. At its spring 2015 session, the Joint Meeting adopted proposal 5 of the Working Group on Standards. This proposal was to add EN 16509, excluding Clause 9 as a reference in RID/ADR 6.2.6.4. ECMA proposes that the whole of Clause 9 of EN 16509 - Marking - should not be excluded simply because only one particular mark is missing.
2. In addition, ECMA proposes that the standards referenced in RID/ADR 6.2.6.4 shall be treated in the same way as the standards referenced in RID/ADR 6.2.2.1 and 6.2.4.1 in order that they have to be applied mandatorily.

## Issue 1

3. The current version of EN 16509, Clause 9 is not totally in compliance with the marking requirements of 1.8.8.4.1 (e) RID/ADR. RID/ADR also requires the marking of the type of gas cartridge. This is the only mark not required by EN 16509.
4. To clearly identify the type of a gas cartridge it is necessary to have the following parameters marked:
  - (i) gas identification;
  - (ii) gas quantity or pressure;
  - (iii) water capacity.
5. The above parameters (i) and (ii) are already covered in EN 16509 Clause 9.2.1; the only missing parameter is the water capacity.
6. It is therefore proposed, instead of excluding the entire marking clause 9 of EN 16509, to require only the additional marking of the water capacity of the gas cartridge, to be durably and legibly marked on the gas cartridge as required in 1.8.8.4.1 (e).

## Proposal 1

7. Amend the third indent of paragraph 6.2.6.4 as adopted by the Joint Meeting at its spring 2015 session to read as follows (new text underlined):

“- for UN No. 2037 small receptacles containing gas (gas cartridges) containing non-toxic, non-flammable compressed or liquefied gases: EN 16509:2014 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, ~~excluding clause 9.~~ In addition to the markings required in Clause 9.2.1 of EN 16509 the water capacity of the compact cylinder shall be marked on the cylinder to clearly identify the Type.”.

## Issue 2

8. The use of the referenced standards in RID/ADR 6.2.2.1 and 6.2.4.1 is mandatory and ECMA thinks that the use of the standards referenced in 6.2.6.4 should also be mandatory.
9. To ensure that this is the case, the following amendment to the first line of 6.2.6.4 is proposed

## **Proposal 2**

Replace the text of the first line of 6.2.6.4

“The requirements of this section are deemed to be met if the following standards are complied with:”

with the following wording:

“The use of the following referenced standards is mandatory”

## **Justification**

The revision set out in our Proposal 1 ensures compliance of the referenced standard for pressure receptacles, EN 16509:2014, with the requirements of 6.2.6 RID/ADR. Mandatory application (Proposal 2) of the referenced standards in is now consistent with the use of other standards referenced in RID/ADR 6.2.

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