

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**

11 March 2019

Bern, 18-22 March 2019

Item 2 of the provisional agenda

Tanks

Reflection on INF.13: Supplementary information from the informal working group on the inspection and certification of tanks: Proposed amendments to Chapter 6.8 and to Sections 1.8.7 and 1.8.6

Transmitted by the Government of the Netherlands

Introduction

1. In Annex III of document INF.13 amendments to section 1.8.6 of RID/ADR are proposed for the approval and the monitoring of inspection bodies which are responsible for performing the administrative controls, for conformity assessments, type approvals and inspections set out in Chapters 6.2 and 6.8 of RID/ADR.
2. Section 1.8.6 of RID/ADR contains provisions for a competent authority to either approve an inspection body according to a national system equivalent to EN ISO/IEC 17020:2012¹ or on a system based on accreditation only. The national system shall be notified and approved by the RID Committee of Experts or the Working Party on the Transport of Dangerous Goods (WP.15), shall have the same or better requirements than specified in a system based on accreditation and shall be published on the website of OTIF and UNECE.
3. The Netherlands supports the principles outlined in document INF.12 that form the framework for amending sections 1.8.6, 1.8.7 and the relevant Chapters in 6.8 and the proposed amendments to sections 1.8.6, 1.8.7 and Chapter 6.8 in document INF.13.
4. The aim of this document is to explain the benefits of such a national system and to bring the existing experience with such a national system in the Netherlands to the attention of the Joint Meeting.

Consideration

The benefits of a national system

5. A notified and approved national system consists of an integrated framework with procedures and criteria applied for the purpose of properly approving and monitoring inspection bodies for certain tasks. This gives the competent authority the opportunity to assess the inspection body, perform audits and checks at the inspection body and / or its

¹ EN ISO/IEC 17020 gives for conformity assessment general criteria for the operation of various types of bodies performing inspection.

subcontractors and to supervise the proper functioning of the inspection body. Such a national system possesses thorough substantive knowledge for conducting audits, it has the ability to carry out, at any time and frequency, inspections when there are suspicions or indications that the inspection body is not working according to the provisions.

6. For some competent authorities it is easier to monitor an inspection body according to a national system than according to a system that is based on accreditation by the national Accreditation Body. This is because those competent authorities can have knowledge about the technical requirements in RID/ADR, while an Accreditation Body does not have this knowledge themselves. This means that in such cases the Accreditation Body must consult a group of independent experts for performing inspections on inspection bodies and their subcontractors. Such a group of independent experts may not be available in the Contracting Parties which then causes problems for performing the task of accreditation.

7. The outcome of the questionnaire carried out by the informal working group showed that there is no common approach between Contracting Parties and States. Most of them use systems other than accreditation only to approve inspection bodies for tasks not concerning pressure receptacles (ECE/TRANS/WP.15/AC.1/2017/22, para. 2). Currently there are no requirements for these national systems. Introducing the possibility of using a national system and setting out the associated requirements is a step forward towards the harmonization of these systems. It also allows countries to continue using a national system instead of changing their complete system and the publication of the system on the website of OTIF and UNECE provides more clarity to other Contracting Parties and States than is currently the case.

Dutch experience with a national system

8. Since 2011 the Netherlands has used a national system for approving and monitoring of inspection bodies. This system was presented to the informal working group on the inspection and certification of tanks. In the Netherlands the approval and monitoring of inspection bodies is established by conducting audits. These audits also include reality checks at the approved inspection body and at its subcontractors (if applicable). At least every two years a monitoring audit is conducted following a set procedure. In this national system, the conditions and criteria are specified and are based on EN ISO/IEC 17020:2012. This national system gives also the possibility to intervene directly by means of suspending and/or revoking the approval instead of making a notification for further action to the accreditation body.

9. Through this national system, the Netherlands has a lot of knowledge of and insight into the working methods of inspection bodies who are carrying out tasks on inter alia tank containers. Based on our positive experience with a national system, we endorse the use of a more harmonized system across all Contracting States and Parties. This procedure should include sufficient conditions and criteria, such as requirements for the quality management system, independence, impartiality, quality of the body and its personnel and monitoring.

Request

10. The Joint Meeting is invited to include these considerations in the discussions on this issue when views are exchanged on the proposals in document INF.13.
