INF. 51

ECONOMIC COMMISSION FOR EUROPE INLAND TRANSPORT COMMITTEE

Joint Meeting of the RID Safety Committee and the Working Party on the Transport of Dangerous Goods

(Geneva, 11 - 15 September, 2007) Item 3 of the agenda

STANDARDS

Report of the Standards Working Group (9th meeting)

- 1. The Standards Working Group (WG) met outside the plenary sessions of the Joint Meeting under the chairmanship of Mr K. Wieser. The WG was tasked by the Plenary Meeting to consider
 - the consolidated comments on the standards submitted to the delegates of the Joint Meeting as distributed by INF.14;
 - the potential referencing of three more standard on tanks for the transport of dangerous goods as applied for in **INF.25**;
 - the suggestion of Germany as in INF.36, to delete, as a general rule, the paragraphs in the introduction of standards which are dedicated to the relationship of CEN standards with ADR/RID.
- The proposals to adopt the reference to standards that are at stage 3 (Formal vote) are summarised in Annex 1. This Annex also includes those standards which will be available prior to the next meeting of WP.15 in May 2008.
 - Some of the proposed references are put in square brackets (prEN 14025:2008 and prEN 13094:2008) because the approval process of the standards will be completed only beginning of next year. For these cases it is proposed to resolve the residual comments during the Joint Meeting in March 2008 and prepare the final proposed references for ADR/RID 2009 (with respect to RID amended references could be introduced by a corrigendum). If necessary, it is envisaged to hold an ad hoc-meeting in parallel with the WP.15 meeting in May 2008 to resolve remaining pending square bracket, if any.
 - The consideration of EN 14334:2005+A1:2008 was rejected because major non-compliances are seen which are not expected to be overcome within this period of time. Furthermore it was argued that a standard on testing and inspection of tanks is already referenced in ADR (EN 12292).
- 3. The comments and recommendations from the members of the WG on **INF.14** were addressed and consolidated in **Annex 2** to this document, which will be made available on the CEN website.
 - As a result of this review the working group would support a reminder of the Joint Meeting to the acting standardising bodies that the alignment of referenced standards with ADR/RID should be a priority objective for any revision.
- 4. With respect to the German proposal, as in **INF.36**, the members of the group confirmed their understanding of normative references in standards as to be integral parts of standards. The referenced standards could not be replaced by alternatives.
 - Consequently, the group supports the deletion of the following paragraph in the foreword of all relevant standards:
 - "The standards listed in the normative references and covering the basic requirements of the RID/ADR not addressed within the present standard are normative only if the standards themselves are referred to in the technical annexes of RID/ADR."

If this proposal is accepted by the Joint Meeting, CEN Management Centre will inform all relevant TC secretaries and this decision will then be implemented for all new, revised or amended standards.

It will also remind them that normative references are required to be in compliance with ADR/RID and this compliance is included in the assessment of standards by the CEN consultant.

5. The issue of compatibility proofs for plastics packaging and IBCs (**prEN ISO 23667**) was not discussed any further with regards to the results of discussion in plenary. It was agreed that guidance to the responsible CEN/ISO WGs shall be given by the CEN Consultant, based on the views expressed and intended to arrive at a merged standard for both packaging and IBCs. Furthermore, the assimilation list should be reconsidered to take into account that problems have arisen with its application.

Annex 1

Proposals to amend ADR/RID

 <u>Proposal:</u> modify the <u>existing</u> references to the indicated standards in 4.1.4, P200 of ADR/RID when the amendments are published:

Reference	Title of document	Applicable sub- sections and paragraphs
Replace:	LPG equipment and accessories - Trans-	P200(7), (10)ta
EN 1439 :2005 (except 3.5 and Annex C)	portable refillable welded steel cylinders for	
in (11) by:	liquefied petroleum gas (LPG) - Procedure	
EN 1439:[2008] (except 3.5 and Annex G)	for checking before, during and after filling	

Proposal: modify the existing reference to the indicated standard in the table to 6.2.2 when the amendment is published:

Reference	Title of document	Applicable sub- sections and paragraphs
for design and construction		
Replace: <i>EN 1442 :1998/A2:2005</i> by : <i>EN 1442:2006+A1/[2007]</i>	Transportable refillable welded steel cylinders for liquefied petroleum gas (LPG) - Design and construction	6.2.1.1.1 and 6.2.1.5.1,

3. **Proposal:** modify the <u>existing</u> reference to the indicated standard in the table to 6.8.2.6 when the amendments are published:

Reference	Reference Title of document			
ADR: for tanks for gases of Class 2				
Replace: EN 12493:2001 (except Annex C) by: EN 12493:[2008] (except 6.8.2.1.17 and Annex C)	LPG equipment and accessories - Welded steel tanks for liquefied petroleum gas (LPG) - Road tankers - Design and manufacture	1.2.1, 6.8.1, 6.8.2.1, 6.8.2.5, 6.8.3.1, 6.8.3.5, 6.8.5.1 – 6.8.5.3		
Replace: EN 12252:2000 by: EN 12252:2007 (except 6.1.3.3.6)	LPG equipment and accessories – Equipping of LPG road tankers	6.8.3.4.9, and 6.8.3.2		
Replace : EN 13094 :2004 by : [EN 13094 :2008]	Tanks for the transport of dangerous goods – Metallic tanks with a working pressure not exceeding 0,5 bar – Design and construction	To be discussed by the Joint Meet- ing in March 2008		
Replace : <i>EN 14025:2003</i> by : <i>[EN 14025:2008]</i>	Tanks for the transport of dangerous goods – Metallic pressure tanks – Design and con- struction	To be discussed by the Joint Meet- ing in March 2008		

Standards Working Group of the Joint Meeting ADR/RID 9th meeting, Bern, 11. – 15. Sept., 2007

Consolidated comments on standards submitted by CEN before the meeting and as result of the discussion by the Working Group

Standards at Stage 3: Submitted for Final Voting

1. Dispatch from CEN dated 11.04.2007

ders for liqu		LPG equipment and accessories - Transportable refillable welded steel cylinders for liquefied petroleum gas (LPG) - Procedure for checking before, during and after filling		Where to refer in ADR/RID: P200(7), (10)ta	Applicable sub-sections and paragraphs: P200(7), (10)ta
	,	nent dated 9.4.2007 rs of the Joint Meeting:			
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	3.6	Disagree with the recommendation of the CEN Consultant that a definition of composite cylinder is required to assist understanding of the definition of casing. EN 14427:2004 on composite cylinders is a normative reference and the term is well understood by likely readers of this standard and of the RID/ADR.	none	"Composite cylinders" can either be understood as cyl- inders made from composite materials or cylinders, com- posed from cylinder and outer casing, i.e. protected cylinders	The addition of a NOTE is recommended referring to the terminology standard EN ISO 10286:2005. Action: Ireland to introduce an editorial comment during the UAP
UK	General	Other comments by the CEN Consultant are supported.			Protected cylinders to be exempted Consistent reference to ADR and RID
UK	General	The reference will need to exclude protected cylinders.	Add a Note Note: Carriage of pro- tected cylinders as defined in this standard is prohib- ited in ADR/RID.	The introduction of requirements on protected cylinders in the ADR/RID could be the better alternative to cover its use in some countries.	Agreed; reference is exempting protected cylinders. Action: For the future, AEGPL to submit justification for the introduction of protected cylinders in the ADR/RID.
СН	General	The standards EN 14794 / 14763 / 14913 mentioned in the introduction of the Consultant's assessment are not for periodic testing but for test during filling procedure		Correct; however, the statements of the assessments are not touched by this incorrect nomination.	No impact on reference.
СН	3.51	Protected cylinders are not part of the ADR	Exception to be mentioned in the standard table	Correct; but they are used in some ADR/RID countries.	See above.
СН	3.15	tara weight	Tara mass?	Support the use of SI-units	Agreed to use SI- units throughout the

				throughout all standards; in this case "tare mass".	standard. Term "tare mass" to be used. Action: Ireland to submit an adequate proposal during the UAP.
Decision of the STD's Working Group:		Accepted X Refused □	Comments: Protected cylin	ders to be exempted; indicated	actions to be followed.
EN 1440:2005 rev LPG equipment and accessories - Transportable reders for liquefied petroleum gas (LPG) - Periodic reders			Where to refer in ADR/RID: P200(10v), 6.2.1.6	Applicable sub-sections and paragraphs: 6.2.1.5.6 and 6.2.1.7	
CEN consultants <u>assessment</u> dated 9.4.2007 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	General	The reference will need to exclude protected cylinders.	Add a Note Note: Carriage of pro- tected cylinders as defined in this standard is prohib- ited in ADR/RID.	The introduction of requirements on protected cylinders in the ADR/RID could be the better alternative to cover its use in some countries.	The addition of a NOTE in the standard is supported to indicate the use of protected cylinders in some member states. Action: Ireland to submit an adequate text during the UAP.
UK	4	What is the content of a written scheme? No explanation, guidance or definition is given.		Would support an amend- ment such as "written scheme, describing respon- sibilities, works procedures, criteria, etc."	The addition of a NOTE in the standard is supported in line with the contents suggested by the Consultant. Action: Ireland to submit an adequate text during the UAP.
UK	4	The standard should clarify that 10 years between periodic inspections is a maximum interval.	Second sentence to start "The maximum interval between periodic inspec- tions" In the third sentence replace "period" by "maximum interval".	Agree	Agreed. Action: Ireland to submit an adequate text during the UAP.

UK	5.1; Table 1	The proposed inspection elements for steel cylinders do not conform to RID/ADR which requires both an internal inspection and a hydraulic or pneumatic proof pressure test.	Either the standard to require all tests in RID/ADR or a submission made to the Joint Meeting for a change to 6.2.1.6	Agree	The option to replace the hydraulic pressure test by a visual inspection need to be exempted in reference text. Action: AEGPL to submit a paper to introduce this alternative in ADR/RID with justification and reference to national experience.
UK	5.3.3.1.1	RID/ADR requires internal inspection on ALL cylinders.	Rewrite this clause accordingly to make it applicable to all cylinders.	Agree	Agreed; 5.3.3, 5.3.4 and 5.3.5 to be exempted.
UK	5.3.5	Note 3 of 6.2.1.6 of RID/ADR allows the replacement of the hydraulic pressure test by a test of equivalent safety. There is no justification provided to show that a leak test at 6 bar achieves the same safety as a test at the test pressure.	Provide a justification or seek a modification of Note 3 of 6.2.1.6 of RID/ADR to specifically allow this test.	Agree	
СН	General	Protected cylinders are not part of the ADR	Exception to be mentioned in the standard table If this should be part of the ADR a proposal by the LPG industry should be sent to the joint meeting and the problem of the	Correct; but they are used in some ADR/RID countries. Support proposal to encompass current practise.	Agreed; clause 5.4 and Annex G to be excluded; Action: For the future, AEGPL to submit justification for the introduction of protected cylinders in ADR/RID.
			retesting has to be solved		
СН	5.1	A hydraulic test is mandatory! It could be replaced by a test with gas as suggested in 5.3.4.2.1	This point already been discussed several times and is still ignored by CEN!	Agree, that replacement of the hydraulic test by visual internal inspection as in 5.1 with ref. to 5.3.(3) is not covered by ADR/RID.	Agreed; 5.3.3, 5.3.4 and 5.3.5 to be exempted.
СН	5.3.2.4	The test pressure should not be higher than the marked test pressure. P200 is not for design and testing but for packing and gives the minimum test pressure for a receptacle for a certain gas	Exclude d)	Disagree. P200 is also on periodic inspections and specifies MINIMUM test pressures. 5.3.2.4.d), deals with test pressures above the required minimum test pressure and does not contradict ADR/RID.	Accepted following the argument that inspection bodies may not be able to assess the acceptable pressure level and to receive the necessary information.

				The adequacy of the proviso in the last para. of d)"a competent person shall") may be discussed.	
СН	5.3.3.1.1	The minimum calculated wall thickness is not usable as this is no longer marked on LPC receptacles	delete	Support discussion of the user-friendliness	See above
СН	Annex B	It is not possible for an inspection body to find out to which standard a steel cylinder is manufactured.	Delete B and use the same criteria as in Annex A	Should be answered by industry.	Accepted. Action: Industry is encouraged to review EN 1440, EN 14040 in context, to include the design type number as additional marking element, in particular to allow traceability.
Decision of Working G	f the STD's Group:	Accepted \square Refused X	Comments: Protected cylinders to be exempted; indicated actions to be followed.		ctions to be followed.

2. Dispatch from CEN dated 18.04.2007

prEN ISO		Packaging – Transport packaging for dangerous g plastics composite IBCs - Compatibility testing /IS		Where to refer in ADR/RID: 4.1.1.19, 6.1.6, 6.5.6.3 – 6.5.6.9	Applicable sub-sections and paragraphs:
		nent dated 12.2.2007 rs of the Joint Meeting:			
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
СН		Referring to ECE/TRANS/WP.15/AC/2007/12 and INF.50 (March 2007) a merger of the two standards EN ISO 16101 and prEN ISO 23667 should be discussed but neither of the standards where available to the delegates. For this purpose the CEN consultant should inform if there are differences between the prEN ISO 16101fv (2002-08) and the actual standard.(Sept 2004)	The two standards should be merged as they are equal with the exception of a very few specific items which also could be incorporated in one standard. This procedure would also allow the correction of the differences between the standards and also between the directives as mentioned	Supported. However, further decisions should be prepared, such as: Shall - the design type test requirements, as in ADR/RID 6.1.5 and 6.5.4, - the specification of the standard liquids, - the assimilation procedure, - the assimilation list	Not discussed, as a consequence of the reaction by plenary.

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			by the CEN consultant.	be repeated in the (merged)	
				standard?	
				For information:	
				prEN ISO 16101fv (2002-08)	
				is sufficiently identical with	
				the published version, as to	
				prepare a sound recommen-	
				dation on the future of this	
				standard and EN ISO 23667,	
				which was dispatched in	
				FDIS version (see above).	
Decision of the STD's		_	Comments:		
Working Group:	Accepted	Refused			

3. Dispatch from CEN dated 01.06.2007

EN 12493:2	<u>2001 rev</u>	LPG equipment and accessories - Welded steel tanks for liquefied petroleum gas (LPG) - Road tankers - Design and manufacture		Where to refer in ADR: 1.2.1, 6.8.1, 6.8.2.1, 6.8.3.4.9, 6.8.2.5, 6.8.3.1, 6.8.3.5, 6.8.5.1 – 6.8.5.3	Applicable sub-sections and paragraphs: 1.2.1, 6.8.1, 6.8.2.1, 6.8.2.5, 6.8.3.1, 6.8.3.5, 6.8.5.1 – 6.8.5.3
CEN consu	ıltants <u>assessn</u>	nent dated 28.5.2007			
Comments	from membe	rs of the Joint Meeting:			
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
D	Annex D	In general, one main aim of a revision should be to bring the standard in line with ADR requirements. It is not user-friendly to have furthermore noncompliances with ADR in the basis of a tank standard (calculation of minimum wall thickness).	Change the calculation in compliance with ADR	Earlier critics on this point led to the NOTE under D.2.1, introducing a correlation factor of 1,2 to determine the design pressure to be used.	To be considered for future amendments. Differences in history (relationship with standards on stationary tanks) and user groups of the standard are to be reflected is this context.
D	10.8	"Pressure test". There is a special standard (EN 12972) for testing and inspection of metallic tanks in ADR. EN 12493 is not an inspection and testing standard in the sense of e.g. initial inspection of tanks according to ADR (done by an inspection body for approval).	Delete "6.8.2.4.1" in the applicable sub-sections and paragraphs in the reference of EN 12493 in 6.8.2.6 ADR	Disagree. The tests described in 6.8.2.4.1 are seen as manufacturing tests to be performed after the design type has already been approved (see first indent "conformity to the AP-	Comment accepted. Standard addresses the manufacturing process ending with the initial inspection (normally inhouse). However, initial inspection is subject to EN 12972.

				PROVED type".	
UK	5.2	Surge plates spaced at 4 metres do not meet the requirement of ADR 4.3.2.2.4 for 7,500 litres enclosed volume when the diameter is between 1.54m and 1.8m so tanks cannot be used part filled.	Make the volume enclosed by surge plates 7,500 litres max. for all tanks (assum- ing the proposals from the March 2007 meeting of the Tanks Working Group are confirmed)	Agree.	Following the confirmation of the tank working group, the addition of a NOTE is suggested to warn users of tanks built acc. to this standard, that its use may be restricted with respect to the degree of filling.
UK	General	Agree Consultant's assessment			 Reflection of the design type approval procedure which is not reflected in the standard. A conflict with ADR is not given as ADR 6.8.3.3 is not claimed to be an applicable paragraph. The adding an adequate NOTE referring to the approval procedure is suggested; Some wording differences of terms, such as road tankers, ISO type containers are proposed to interpret into ADR speech in a NOTE. Actions: CEN to consider the addition of the NOTES.
СН	General	As suggested by the Consultant the change of the entry in ADR should be postponed until a revised version is accepted by the standard working group			Taken into account, as described above, exemptions of applicable clauses included.
Decision of the STD's Working Group: Accepted X Refused		Comments: With the addition	on of NOTES to the standard		

EN 1442:20		(LPG) - Design and construction		Where to refer in ADR/RID: 6.2.1.1.1, 6.2.1.5.1, P200(3-4), 6.2.1.7	Applicable sub-sections and paragraphs: 6.2.1.1.1 and 6.2.1.5.1 ,	
Comments	Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards	

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UK		No comments			
СН	general	There is a new version of prEN 1442A1 (August 2007) which has not been distributed to the delegates		EN 1442:2006+A1 is the same then version of prEN 1442A1 (August 2007) which has been distributed to the delegates in its draft version as usual before the FV launching (see dispatch 3 – 2007-09 session).	Clarified
СН		EN 1442:2006 is not available	prEN 1442/A1 has to be judged together with the whole standard	EN 1442:2006 was made available before the launch- ing of the FV as usual al- ready at the occasion of the 2006-03 session – see dis- patch 2	Clarified
СН	9.8.5	of EN 1442:2006 if cylinders are heat treated, the heat treatment shall be repeated after weld repair	amend standard	Valuable technical point; should be resolved.	Technical issue; to be settled until March 2008. Action: AEGPL to provide for technical background information.
СН	10	Note should read: Marking in accordance with EN 14894 must comply with the requirements	amend	Disagree; such wording would be inadequate for NOTES.	Accepted ACTION CEN to reinstall reference to EN 14894:2006 in the NOTE
СН	Table A.1	The marking of Butane or Mixture A must be placed out of the range of the RID/ADR Marking (and should be connected with the appropriate UN number)	amend	Disagree; ADR/RID 6.2.1.7.5 requires that other marks shall not conflict with required marking and its placement without negative consequences on stress situation. Separation from required marking is not part of ADR/RID.	Agreed to add following note: 'RID/ADR states that additional marks shall not conflict with required marks. This is achieved if the additional marking is separated from required marks by a space'
Decision of the STD's Working Group:		Accepted X Refused □	Comments: With additional note		

4. Dispatch from CEN dated 02.07.2007

EN 12252:2005 +prA1:2007		LPG equipment and accessories – Equipping of LPG road tankers		Where to refer in ADR/RID: 6.8.3.4.9, 6.8.3.2.9 and 6.7.3.8.1.1	Applicable sub-sections and paragraphs: 6.8.3.4.9, and 6.8.3.2
CEN consu	ıltants <u>assessm</u>	<u>ent</u> dated 29.6.2007			
Comments	from member	rs of the Joint Meeting:			
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
СН		Latest issue of EN 12252 was not made available to the delegates!		The latest issue of EN 12252 was not made available to the delegates. As agreed, standards in published form are not made available to delegates, as a principle. However, the version prior launching of the FV was dispatched at the occasion of the 2005-09 meeting (dispatch 1).	Clarified
D	A1	A standard for equipment and accessories should contain the set pressure of possible safety valves. A deletion of the set pressure is not user-friendly.	Add the right set pressure of ADR (between 0.9 and 1.0 times the test pressure of the tank)	Would support the addition of set pressures compliant with ADR/RID.	Missing set pressure is not seen as non compliance with ADR. Its addition would have been more user-friendly
D	6.1.3.3 b)	Filling to vapour phase - At the last joint meeting a new decision/clarification was adopted (Inf. 16 B). 6.8.3.2.3 ADR All filling and all discharge openings of tanks A non-return valve does not fulfil the provisions of this paragraph. 6.1.3.3 b) of EN 12252 is not in line with ADR.	Delete b) and add in a) Discharge/filling to liquid and vapour phase	An adequate clause should be added to A1 to align EN 12252:2005 with ADR/RID 2009	6.8.3.2.3.to be excluded with except of 6.1.3.3
UK	2	Reference to clause 9.6 – this clause does not exist	change to 9.2.6	Disagree. 9.6 of EN 12252:2005 deal with the leak test, which is altered by A1, clause 2.	Withdrawn

INF.51

Decision of the STD's Working Group:		Accepted X Refused \square	Comments: Editorial amendment to clause 9.6 required		
СН	9.6	The last sentence does not specify the minimum leakproofness test pressure as specified in ADR 6.8.3.4.9	The original sentence should be kept with the addition of the word "using " after test pressure		less then 20% of the test pressure <u>using</u> the LPG vapour pressure'
UK	2	Proposed wording in clause 9.2.6 does not specify the pressure of the leakproofness test – it is only specified for gas free testing.	insert after the word 'shall' the following "be not less than 20% of the test pres- sure and shall be"	Comment seems to refer to an earlier draft; the pub- lished text o EN 12252 specifies minimum pressures for both, tank in gas free condition and in gas service.	The editing of the initial clause of the standard should have been kept with the addition of the missing word 'using' The clause should be read as follows: 'If the tank is in gas service, the leak-proofness test pressure should be not