Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods Bern, 17–21 March 2014 Item 2 of the provisional agenda Tanks

14 March 2014

Tanks: UK experience with improperly manufactured and wrongly certificated road tank vehicles

Transmitted by the Government of the United Kingdom

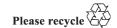
Background and discussion

Introductory Note: The contents of this paper, and the test results and conclusions set out within it, are disputed by the tank manufacturer and are the subject of ongoing legal proceedings.

- 1. The UK competent authority, the Department for Transport, has become aware of apparent deficiencies in the certification and manufacture of certain tanks imported into the UK.
- 2. The Health and Safety Executive is the enforcing body for this matter and has undertaken sample inspections on some tanks revealing a number of areas where the sampled tankers do not meet the requirements of ADR. These are that:
 - Radiography was not completed to ADR 6.8.2.1.23 and EN 12972,
 - The weld quality was not to ADR 6.8.2.1.6, EN 13094, EN 12972 and EN ISO 30042, and
 - The man-way neck rings were not constructed to meet the requirements of EN 13317 Annex B as required by ADR 6.8.2.6.
- 3. Owing to the number of irregularities seen in the welding on the tank vehicles it has not been possible to bring them into full compliance with ADR. Therefore the UK competent authority is persuading operators to replace the affected tankers as soon as practicable and, as an interim measure for national transport only, has issued national Authorisation No. 409, available to view at:

 $https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/261292/authorisation-409.pdf$

4. In parallel, the UK competent authority is funding research including full scale testing on a small sample of tankers. The short term aim of the research is to establish whether a tanker displaying serious weld deficiencies can withstand a rollover which would help demonstrate a better than equivalent level of safety required by ADR and so lend support to the Authorisation. It would be of further value to know whether a modified tanker and an ADR compliant tanker could also withstand a rollover condition in order to establish relative levels of safety under rollover conditions. In the much longer term this



research might lead to the development of a performance based standard that could give manufacturers an alternative to the current design based standard which may be of interest to other ADR contracting parties.

- 5. This situation has caused the UK competent authority to review its procedures for appointing and monitoring the performance of the authorised inspection bodies. In doing so it has paid particular attention to the extra-territorial activities of such bodies. Attached at Annex A is a near final version of its revised guidance. Adherence with it, together with more rigorous monitoring of performance and greater control over the issue of GB certificates of approval through a centrally operated database, should prevent a recurrence. Also it will provide assurance of the authenticity of GB certificates to international authorities.
- 6. Given the source of the non-compliant tanks and the extra-territorial activity of the inspection body, the UK competent authority supposes that this issue may not be unique to the UK. In consideration of the possibility that other Contracting Parties may experience similar difficulties, the Joint Meeting may wish to take note of the measures the UK competent authority is taking.

Proposal

- 7. The UK competent authority proposes to hold a 60 minute question and answer session following the Tuesday afternoon session of the Tanks Working Group at 1745 on 18 March 2014. This would also be an opportunity for the UK experts to provide more technical detail to interested delegates.
- 8. The UK competent authority also proposes to report on its experience in implementing changes aimed at avoiding a recurrence to a subsequent session of the Joint Meeting.
- 9. The UK competent authority further proposes to keep subsequent sessions of the Joint Meeting appraised of the research it is funding to obtain a fuller understanding of the safety of road tank vehicles.
- 10. The UK competent authority anticipates that in due course it will propose amendments to the UN Model Regulations concerning the conformity assessment system and approval of portable tanks. The UK competent authority will develop any such proposals in consultation with the Joint Meeting.

Annex A

Draft Arrangements for the appointment of inspection bodies for tanks

1. Introduction

- 1.1 These procedures describe the requirements applying in the United Kingdom for the accreditation and appointment of authorised inspection bodies (AIBs) under The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations, 2009 (as amended) (CDGR 2009), The Carriage of Dangerous Goods and Transportable Pressure Equipment (Northern Ireland) Regulations 2010 (as amended) and the Merchant Shipping (Dangerous Goods) Regulations 1997, which implement the provisions of the RID², ADR³ and the IMDG Code⁴ in UK law in respect of the authorisation and inspection of tanks.
- 1.2 An AIB shall at all times be responsible for ensuring that the functions are carried out in accordance with the requirements of the implementing regulations.
- 1.3 For the purpose of this document:

'tank' shall mean as defined under this term in RID, ADR, CDGR or the IMDG Code and includes those listed below:

- RID/ADR 6.7.2.18, 6.7.2.19, 6.7.3.14, 6.7.3.15, 6.7.5.11, 6.7.5.12, 6.8.2.3, 6.8.2.4, 6.8.3.3, 6.8.3.4, 6.9.4, 6.9.5, 6.10 and 6.12
- IMDG Code. 6.7.2.18, 6.7.2.19, 6.7.3.14, 6.7.3.15, 6.7.5.11, 6.7.5.12, 6.8;
- DSC/Circ12 (as amended) Guidance on the continued use of existing IMO type portable tanks and road tank vehicles for the transport of dangerous goods
- · UK tanks Procedures for Inspection Bodies Testing and Inspection of UK tanks
 - "Appointed Inspection Body (AIB)" a body authorised to assess the tanks defined in their accreditation and appointment which will be published in the letter of appointment. The VCA DGO on behalf of the Secretary of State for Transport issues letters of appointment

"Notified Body" an AIB appointed to undertake inspections on tanks which are in scope of Directive 2010/35/EU on transportable pressure equipment (TPED). "The Secretary of State for Transport" has the responsibility for appointing Notified Bodies for TPED in the United Kingdom to carry out the functions referred to above and for notifying the appointments to the European Commission and other member/EEA States.

1.4 In the United Kingdom, Inspection Bodies are appointed under regulation 29 (2) of The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations, 2009 (as amended) or by the MCA under Merchant Shipping Notice 1852.

² Regulations concerning the International Carriage of Dangerous Goods by Rail (RID)

The European Agreement Concerning the International Transport of dangerous Goods by Road

The International Maritime Dangerous Goods Code

2. Criteria, application and appointment

- 2.1 An organisation wishing to be appointed as an authorised inspection body in the United Kingdom shall meet the requirements set out in the paragraphs below. It should, however, be noted that meeting the requirements for appointment will not automatically lead to such an appointment as this remains at the discretion of the Secretary of State. Reference should also be made regarding insurance arrangements. The Secretary of State will not in relation to any case or circumstance cover the liability of an AIB. Where the AIB carries out functions covered by TPED their appointment is notified to the European Commission and they become "Notified Bodies".
- 2.2 Persons or organisations wishing to be appointed as an AIB should make an application to the VCA Dangerous Goods Office (VCA DGO). The application, which shall be made on the appropriate form (available on the <u>VCA DGO website</u>), should describe the inspection and certification activities for which the applicant wishes to be appointed. In due course the applicant shall submit the certificate and schedule of accreditation issued by UKAS together with evidence of the applicant's insurance cover. This will represent formal notification to the Secretary of State of the intention to proceed with the application for appointment.
- 2.3 At the same time applicants for AIB status shall make an application for accreditation to the United Kingdom Accreditation Service (UKAS) which will undertake an assessment of the applicant against the relevant mandatory standard(s) to ensure that the applicant complies with the requirements. Applications shall be submitted to UKAS directly. The scope of accreditation will be defined by reference to the standards and procedures listed in paragraph 0 (above) and applicants shall indicate the particular functions (see Annex A) in respect of which they wish to be accredited. Applicants being accredited for any tank listed in ADR/RID shall take account of the requirements of 1.8.6 of ADR/RID when making their application. A copy of the application to UKAS should be forwarded to VCA DGO.
- 2.4 Once UKAS has granted accreditation, it will issue an accreditation certificate and schedule to the inspection body (IB) and copy the information to VCA DGO. The IB shall then confirm to VCA DGO that it wishes to seek formal appointment. The VCA DGO on behalf of the Secretary of State will then make a decision on appointment <u>based on</u> all of the evidence. If satisfied that the applicant is fit for appointment under the Regulations, the Secretary of State will offer to appoint the applicant as an AIB subject to their written acceptance of the conditions of appointment.
- 2.5 The conditions of appointment are set out in Annex B
- 2.6 Once acceptance of the conditions of appointment has been received, the VCA DGO will issue a letter of appointment. Notification of the appointment will then be made to the applicant and will be published on the VCA website.
- 2.7 UKAS will submit a report on the accreditation visit(s) to the VCA DGO. UKAS will advise the VCA DGO of the outcome of annual surveillance, four-yearly re-assessment and any other necessary monitoring in intervening periods of the AIB in order for the VCA DGO to take any necessary decisions about the continuation of the AIB's appointment. The information provided by UKAS to the VCA DGO will include supporting documentation such as a copy of the assessor's visit report, details of identified deficiencies and any agreed remedial action.
- 2.8 To be eligible for appointment as a United Kingdom AIB for the purposes of the Regulations, an applicant must be a legal entity in the United Kingdom and carry out its assessment functions within the jurisdiction of the United Kingdom. It may, where

necessary, conduct inspections, including any necessary tests outside the United Kingdom subject to the requirements of Annex C. and with the prior agreement of the VCA DGO. The AIB shall take full legal responsibility for such inspections and tests and shall issue the appropriate GB certificate from the UK (see paragraph 0).

- 2.9 In providing services to manufacturers and operators falling under the scope of these procedures, AIBs should try to minimise any detrimental impact to those businesses. AIB's must not place undue financial or other conditions upon such manufactures and operators. The procedures under which an AIB operates must be administered in a non-discriminatory manner.
- 2.10 Where an AIB wishes to apply for an extension to the scope of their inspection activities they will arrange an additional assessment with UKAS and inform VCA DGO of their intentions. Once an extension of accreditation has been granted by UKAS the procedure in 2.4 will apply.

3. Meeting the criteria

Accreditation

- 3.1 Applicants are required to demonstrate conformity with the provisions set out in RID, ADR and the IMDG Code by being accredited to EN/ISO 17020 which contains requirements for bodies issuing certificates, performing inspections or conducting tests.
- 3.2 All applicants, as part of the accreditation process, will need to meet any additional requirements set out in these conditions of appointment which may change from time to time.
- 3.3 As indicated in paragraphs 0 and 0 (above), applicants will need to state for which functions they wish to be appointed. The scope of accreditation and subsequent appointment will be determined by reference to the functions specified.
- 3.4 Accreditation will be carried out against one or more of the chapters of the regulations (see paragraph 0 above) and relevant standards listed in the regulations. The standard(s) used will depend on the parts of the regulations for which the applicant wishes to be appointed.
- 3.5 All applicants will need to be able to demonstrate their professional ability and a necessary level of understanding of the provisions of the Regulations to be able to carry out the appropriate functions. A list of inspectors to be used, who must be competent persons and who must show a working knowledge of the regulations shall be notified to VCA DGO including their employment status (e.g. full-time, part time, contractor etc.) and any changes notified as soon as reasonably practicable. No inspector shall be used who has not been notified to VCA DGO. Guidance on the qualifications required is provided in Annex D.

Standards

3.6 The Regulations, by reference to ADR, RID or the IMDG Code, define the role of national or international standards which are either mandated or recommended, however it should be noted that the Regulations always take precedence over standards.

Quality system

3.7 An applicant will need to have a Quality System, specified in a Quality Manual and associated documented operational procedures (see 0 below), that is appropriate to the functions it wishes to undertake or certify. The Quality System will need to ensure that all of the relevant requirements of the appropriate standards in the EN/ISO 17020 are met plus any further requirements for appointment and operating as an AIB.

Sub-Contracting

3.8 Where an applicant wishes to sub-contract certain inspection or testing tasks, the Quality Manual of the applicant shall, in accordance with ISO 17020, describe the procedures to be followed by the applicant to ensure compliance by the sub-contractors with the relevant requirements and to demonstrate that the sub-contractor is competent to carry out the task for which it has been engaged. This will include, but is not limited to, the ability fully to conform to the requirements that are placed on the applicant itself in respect of the task contained within the subcontract. The applicant will need to maintain documented procedures for the assessment and monitoring of sub-contractors together with a list of subcontractors and the facilities used by them to carry out work packages on behalf of the applicant. The list will need to form part of the inspection records relating to tank inspections and the Register specified in paragraph 0.

NOTE: The use of individuals engaged as inspectors on a part-time or casual basis (self-employed engineers for example) is considered sub-contracting for the purpose of this document

- 3.9 Except in the case of individual inspectors, sub-contractors, shall normally be accredited to either EN/ISO 17020 for inspections or EN/ISO 17025 for testing, or both. Where the subcontractor is not accredited to either standard then an explanation must appear in the certificate file of the AIB and an equivalent note will have to be placed in the certificate database.
- 3.10 A Register shall be maintained of all sub-contractors used by the applicant together with their qualifications, accreditation status etc.; The Quality Manual will either contain the Register or will state where the Register is to be found. The Register and copies of the sub-contracts, agreements etc. shall be available for scrutiny at any reasonable time on request by UKAS, the VCA DGO or such other person as may be appointed on behalf of the Secretary of State for that purpose.

4. Duties of authorised inspection bodies

- 4.1 An AIB shall assess the conformity of the tank which falls within the scope of its appointment against the requirements of the Regulations. When an AIB assesses a tank as being in conformity with those Regulations, it shall issue the appropriate certificate as specified in the Regulations. Where a tank does not meet the requirements a failure document shall be issued.
- 4.2 An applicant shall have documented procedures covering all aspects of its work relating to the inspection activities for which it seeks approval. As part of the accreditation process, an assessment will be made of the adequacy of the internal organisation and the procedures adopted to give confidence in the quality of the applicant's services. Where judgements or interpretation of a standard or requirement are implicit or explicit in a decision to grant or withhold certification, the applicant will be required to have procedures for achieving consistency.

NOTE: VCA DGO shall maintain a list of common interpretation issues on which guidance has been given. These will be available to all AIBs.

- 4.3 An AIB shall maintain an up to date record of any certification that it has issued, and to whom it has been issued. From [2014] the inspecting bodies shall issue certificates from a web based electronic delivery system managed by the VCA. The database will include the name of the AIB, the inspector undertaking the work and any subcontractors along with details of the tank. All tank inspection records (certificates and inspection reports) will need to be made available on request to the VCA DGO on behalf of Secretary of State or such other person as may be authorised by the Secretary of State.
- 4.4 An AIB shall inform the Secretary of State and UKAS immediately of any changes that in any way affect its ability to carry out the duties specified in its letter of appointment. This includes any change in its status, ownership, location, key personnel, technical competence, facilities etc.

5. Contact point and sources of relevant documents

5.1 Annex E contains contact details for the VCA and UKAS together with the details for obtaining copies of the regulations, ADR/RID, the IMDG Code and EN/ISI 17020.

Annex A

Applications for accreditation and appointment

The following must be included in the application to UKAS and VCA

Tank materials to be inspected:

- Aluminium
- · Fibre Reinforced Plastic
- · Carbon steel
- Stainless steel

Tank types to be inspected:

• This may be done by listing the appropriate clauses in 1.3 but should define types e.g. low pressure, vacuum, chemicals, gases liquefied gases, MEGC etc.

Tank equipment

• Pumps, relief devices

Type of appointment being sought

- Type approval
- · Initial inspection
- · Exceptional checks
- Periodic &, intermediate inspection in service

Annex B

Terms and Conditions of Appointment

Appointment under The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations, 2009 (as amended) and the Merchant Shipping (Dangerous Goods) Regulations 1997

Conditions of appointment

- 1. «CoName» (hereinafter called 'the appointee') shall, subject to the scope of the appointment, carry out those procedures and specific tasks which are, by virtue of the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (as amended), (CDGR 2009) and the Merchant Shipping (Dangerous Goods) Regulations 1997 [where appropriate] the procedures and specific tasks to be undertaken by an appointed person for:
 - · RID or ADR Tanks
 - UK Tanks
 - Portable tanks
 - · IMO tanks

Note the full list of tanks can be found in clause 1.4

This includes complying with all the requirements of ADR⁵ and RID² and the IMDG Code that are, by virtue of CDG 2009, relevant to the carrying out of those procedures and tasks. The appointee shall not in purported pursuance of its appointment carry out any work which is outside the scope of the appointment, which is that indicated by an asterisk (*) in the United Kingdom Accreditation Service (UKAS) Schedule of «SchedType», Issue No. «ShedIssue», dated «ShedDate» or later issue which the Secretary of State for Transport or anyone acting on his behalf has acknowledged in writing to the appointee.

- 2. The appointee shall ensure that it is competent to carry out the procedures and specific tasks for which it has been appointed. It shall remain at all times responsible for the quality of the work undertaken pursuant to its appointment (whether that work is undertaken by an employee of the appointee or not).
- The appointee shall at all times maintain adequate liability insurance. The Secretary
 of State for Transport assumes no liability for the actions of the appointee or the work
 undertaken by him.
- 4. The appointee shall ensure that any person (whether an employee of the appointee or not) who carries out a procedure or specific task on its behalf pursuant to its appointment:
 - (a) Is competent to carry out that procedure or specific task;

As defined in regulation 2 of the Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009 (S.I. 2009 No. 1348).

- (b) Has the equipment necessary to carry out that procedure or specific task;
- (c) Checks that the equipment referred to at (b) above has been properly maintained and will provide accurate results;
 - (d) Makes a record of the work undertaken, including methodology and results;
- (e) Provides any record made in pursuance of (d) above to the appointee (if not already in its possession) as soon as is practicable following the completion of the work to which it relates.
- 5. The appointee shall keep a record of all work undertaken pursuant to its appointment, whether by the appointee's employees or not, including those records provided to the appointee in pursuance of 4. (e) above. Any such record may be stored electronically. Such measures as are reasonable shall be taken by the appointee to prevent the integrity of those records being damaged, whether by unauthorised alteration, destruction or any other means. Reasonable measures shall include ensuring that the records are stored securely, unauthorised access to or alteration of those records is prevented and appropriate steps are taken to ensure that a backup copy, in hard copy or otherwise, of any record is available in the event of a failure of an electronic storage system on which a record is stored.
- 6. The appointee shall, when requested by the Secretary of State for Transport or anyone acting on his behalf, provide a summary of all work undertaken pursuant to its appointment, whether by the appointee's employees or not including, but not limited to, the type, size, quantity and where present, the serial numbers of items inspected, tested or repaired (as applicable) within the scope of the appointment. Such information shall be provided in the format and within the timescale that the requestor shall reasonably require.
- 7. The Secretary of State for Transport or anyone acting on his behalf, including, but not limited to, the United Kingdom Accreditation Service, may carry out an inspection of the appointee at any time to ensure that it is complying with any of the conditions of appointment. The inspection may include an examination of premises, equipment and documents, including any records kept by the appointee in pursuance of 5 above. To facilitate any inspection the appointee shall make available to the person(s) carrying out the inspection such copies, facilities, assistance and information as are reasonably required for its purpose.
- 8. The appointee shall inform the Secretary of State for Transport in writing as soon as reasonably practicable of any:
- (a) Change in the name of the appointee or its registered address, trading name or trading address;
- (b) Change in the structure, ownership or solvency of the appointee that might be relevant to the appointee's competency to carry out the procedures and specific tasks for which it has been appointed, or;
- (c) Finding, including any finding of dishonesty, against the appointee or a person carrying out a procedure or specific task on behalf of the appointee (whether an employee of the appointee or not) made by a criminal or civil court or regulatory body that might be relevant the appointee's competency to carry out the procedures and specific tasks for which it has been appointed, including in relation to any work which has already been carried out, unless to do so would breach any applicable law relating to the disclosure of information.
- 9. [The appointee shall pay an initial fee when first appointed and an annual fee for each subsequent calendar year or part thereof that appointment remains in effect. The annual fee shall be invoiced in the final quarter of the year preceding that for which it is due

and payment must be received by 21 December following the invoice date. Failure to remit the annual fee by the due date will result in termination of the appointment. A variation fee shall be payable for any modification or extension of scope which is requested by the appointee. The scale of fees shall be published on the VCA Dangerous Goods Office website and may be amended from time to time. Fees are non-refundable.]⁶

- 10. The appointee may terminate its appointment by giving 90 days' notice in writing to the Secretary of State for Transport.
- 11. If it appears to him that the appointee is not complying with any of the conditions of appointment the Secretary of State for Transport may terminate the appointment. In terminating the appointment the Secretary of State may give such notice to the appointee as he considers appropriate, including providing no notice.
- 12. If the appointment is terminated for any reason, the Secretary of State for Transport may give directions to the appointee for the purpose of making such arrangements for the determination of outstanding applications made to the appointee pursuant to its appointment as he considers appropriate.
- 13. This appointment shall come to an end upon the revocation of CDGR 2009 except that applications to the appointee to carry out any (specific) task(s) that are outstanding at the time of the revocation shall be dealt with by the appointee pursuant to this appointment.

This paragraph will be amended to reflect the new fee structure that will be introduced with the introduction of the new VCA database of certificates.

Annex C

Inspections performed outside the UK

An AIB who wishes to undertake inspection functions outside the UK under the terms of their UK appointment shall comply with the following conditions:

- 1. Contracts for type approval, initial inspection, in-service inspection and exceptional checks shall be placed by the customer requiring the inspection directly with the inspection body identified on the appointment document and not with or through any subsidiary, local branch, intermediary or agency, howsoever named, regardless of their legal entity and relationship with the AIB.
- 2. The Design Review and type approval functions shall be performed in the UK by competent, UK based person(s) and all records, drawings, calculations etc pertaining to the Design Review and type approval shall be kept in the UK.
- 3. If initial or in-service inspection is to take place outside the UK it shall be performed in its entirety by either:

a competent inspector with appropriate skills, qualifications and approvals, operating from the UK and visiting the place of inspection as necessary to perform the required functions.
a competent inspector with appropriate skills, qualifications and approvals, based in the country in which inspection takes place, working under the direct control of the UK AIB. Direct control means each inspector shall be trained, approved, supervised and managed on a day to day basis by the UK AIB, and shall be audited by them annually. The inspector shall be employed directly by, or contracted personally to the UK AIB, and

shall not be engaged via a relationship with any local branch of the AIB nor any

4. Overseas locations at which inspections take place shall be identified to UKAS

intermediary or agency howsoever named.

- 5. Subject to conditions 1 & 2 above, a UK AIB that is a subsidiary part of a parent organisation may engage another suitably skilled subsidiary of that organisation, situated in the country in which inspection is to take place, (a local subsidiary) for the purpose of inspection involving judgement or decision making. Any such engagement shall be formalised by contract or other such written agreement directly between the parties. The local subsidiary shall be identified as a Key Location on the UK AIB's schedule of accreditation and shall be subject to the scrutiny of UKAS during each annual assessment round. The UK AIB shall conduct an on-site audit of each local subsidiary at least once a year and shall manage, control, monitor and review its work to ensure the quality and consistency of its inspection and decision making.
- In all cases, inspection shall be conducted in accordance with RID/ADR (as applicable), EN 12972 the IMDG Code and UK procedures. Certificates of inspection shall be compiled, approved and issued only by the UK's AIB.
- 7. The UK AIB shall take full responsibility for the work performed by inspectors or subsidiaries engaged in accordance with these conditions.

Annex D

Qualifications categories

There is no specific professional qualification for tank inspectors. Good engineering knowledge is essential, as is a comprehensive understanding of the tank design and construction process. All inspection staff should be able to show a general knowledge of the dangerous goods regulations. In addition AIBs shall have:

For type approval, initial inspection, exceptional checks and conformity of service equipment,

At least one senior member of staff of Chartered Engineer status in each relevant discipline supported by technically qualified and experienced staff with knowledge of the law, codes, inspection techniques and understanding of the operation of the system. They shall have access to a full range of relevant specialist services in fields of material engineering, NDT, welding, design and plant operation.

Periodic & intermediate inspection

At least one member of staff qualified as an incorporated engineer with adequate experience and knowledge of the law, codes, exam and inspection techniques and an understanding of the effects of operation on the system. They shall have established access to basic design and plant operation advice, materials engineering, welding and NDT.

NOTE1: Exceptional checks following major welded repairs or changes of service equipment shall be overseen by an AIB accredited organisation to issue type approval or initial inspection certificates.

NOTE2: UKAS publication RG0 "Guidelines on the competence of personnel undertaking engineering inspections" may assist in identifying suitable staff

Annex E

Contact points

Contact addresses are:

The VCA Dangerous Goods Office

Cleeve Road Leatherhead Surrey

KT22 7NF

Tel: 01372226110 Fax: 01372226116

Email; tanks@vca.gov.uk

United Kingdom Accreditation Service

21 - 47 High Street

Feltham Middlesex, TW13 4UN

Tel: 0208 - 917 8400 Fax: 0208 - 917 8500

Email: kevin.belson@ukas.com

Sources of relevant documents

Copies of the regulations, ADR and RID:

The Stationery Office Ltd

PO Box 29 Norwich, NR3 IGN

Tel: 0870 600 5522 Fax: 0870 600 5533

Email: customer.services@tso.co.uk

Textphone 08702403701

Or from the Office of Public Sector Information website at $\underline{www.opsi.gov.uk}$

Copies of the IMDG Code:

IMO

4, Albert Embankment London SE1 7SR

Information on and copies of the EN/ISO 17020 series of standards are available from:

BSI British Standards 389 Chiswick High Road London, W4 4AL

Tel: 02089969001 Fax: 02089967001

Web: http://www.bsi.group.com