

# ORGANISATION INTERGOUVERNEMENTALE POUR LES TRANSPORTS INTERNATIONAUX FERROVIAIRES ZWISCHENSTAATLICHE ORGANISATION FÜR DEN INTERNATIONALEN EISENBAHNVERKEHR INTERGOVERNMENTAL ORGANISATION FOR INTERNATIONAL CARRIAGE BY RAIL

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# RID/ADR/ADN

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 agenda: Proposals for amendments to RID/ADR/ADN – new proposals

Requirements to be met by MEGCs which consist of non-UN pressure receptacles (Comments on informal document INF.25 of the March 2015 Joint Meeting)

## **Comments by Germany**

### Introduction

- 1. In sub-section 6.8.3.6 of RID/ADR/ADN, there are no references to standards for the construction of MEGCs (multiple-element gas containers).
- 2. Standard EN 13807:2003 referenced in the table in sub-section 6.8.3.6 of ADR explicitly excludes MEGCs from its scope.
- 3. This standard is currently being revised, among other things to extend its scope of application to include MEGCs. This will, however, still take some time; therefore, reference to a revised standard will likely not be possible before RID/ADR 2019.
- 4. Until then, it will thus only be possible to recognize the application of a recognized technical code in accordance with sub-section 6.8.3.7. However, such a code does not exist and would essentially consist of the reference to standard EN 13807:2003 or a partial duplication thereof.

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# **Proposal**

- 5. For the above reasons, Germany considers it advisable to amend sub-section 6.8.3.6 in such a way that standard EN 13807:2003 referenced in the table in sub-section 6.8.3.6 of ADR may, where applicable, also be applied to the design, manufacture, marking, inspection and testing of MEGCs which consist of non-UN pressure receptacles.
- 6. Germany proposes to add the following note to standard EN 13807:2003 in the table in subsection 6.8.3.6 of ADR:

"NOTE: If appropriate, this standard shall also be applicable to MEGCs which consist of non-UN pressure receptacles."

Germany proposes to replace the current wording in sub-section 6.8.3.6 of RID "(Reserved)" by the following:

"NOTE: Persons or bodies identified in standards as having responsibilities in accordance with RID shall meet the requirements of RID.

The standard referenced in the table below shall be applied for the issue of type approvals as indicated in column (4) to meet the requirements of Chapter 6.8 referred to in column (3). The requirements of Chapter 6.8 referred to in column (3) shall prevail in all cases. Column (5) gives the latest date when existing type approvals shall be withdrawn according to 1.8.7.2.4; if no date is shown the type approval remains valid until it expires.

Since 1 January 2009 the use of the referenced standards has been mandatory. Exceptions are dealt with in 6.8.3.7.

If more than one standard is referenced for the application of the same requirements, only one of them shall be applied, but in full unless otherwise specified in the table below.

The scope of application of each standard is defined in the scope clause of the standard unless otherwise specified in the table below.

Reference	Title of document	Applicable sub- sections and paragraphs	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
(1)	(2)	(3)	(4)	(5)
EN 13807:2003	Transportable gas cylinders – Battery vehicles – Design, manufacture, identification and testing  NOTE: If appropriate, this standard shall also be applicable to MEGCs which consist of non-UN pressure receptacles.	6.8.3.1.4, 6.8.3.1.5, 6.8.3.2.18 to 6.8.3.2.26, 6.8.3.4.10 to	Until further notice	