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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
Bern, 12 – 16 March 2018
Item 2 of the provisional agenda
Tanks

## **6.8.2.1.23:** Welding on tanks

## Transmitted by the International Union of Wagon Keepers (UIP)\*

1. Based on the proposals of the informal working group regarding the harmonisation of approval procedures, a proposal to amend 6.8.2.1.23 was discussed in September 2017 in the RID/ADR/ADN Joint Meeting's tank working group and was submitted to the RID Committee of Experts' standing working group meeting in Utrecht in November 2017.

"The ability of the manufacturer, or the maintenance or repair shop, to perform welding operations shall be verified and confirmed by either the competent authority or by the body designated by this authority. A weld quality assurance system shall be operated by the manufacturer or the maintenance or repair shop."

- 2. In general, the proposal should clarify responsibilities for welding approvals in case of repair and modification of tanks, as this issue was considered not to be sufficiently harmonised in Europe.
- 3. In informal document INF.9 submitted to the standing working group, UIP pointed out that particularly in the rail sector, the idea of linking the responsibility for repairs and modifications to an authority would create further questions:
  - which authority (local versus country of registration)
  - which welding procedures (flexibility needed in repairs)

<sup>\*</sup> In accordance with the draft programme of work of the Inland Transport Committee for 2018-2019, (ECE/TRANS/WP.15/237, annex V, (9.2)).

As a result, UIP proposed the amendment shown in bold:

"The ability of the manufacturer, or the maintenance or repair shop, to perform welding operations shall be verified and confirmed by either the competent authority or by the body designated by this authority or in case of welding during maintenance procedures the "relevant inspection body according to 6.8.2.4.5". A weld quality assurance system shall be operated by the manufacturer or the maintenance or repair shop."

- 4. The standing working group noted the arguments, but asked UIP to discuss this again in the informal working group and then submit an official proposal to the Joint Meeting.
- 5. The informal working group supported the UIP proposal and even broadened the proposed wording as follows:

"The ability of the manufacturer, or the maintenance shop in case of modification or repair, to perform welding operations shall be verified by the inspection body performing the relevant inspection. A weld quality control and assurance system shall be operated by the manufacturer or the maintenance shop performing modification or repair."

- 6. The basis for this new proposal is the conclusion that it is not only during any repair process that the responsibility for proper welding procedures regarding type examination, initial testing and of course in the case of repairs lies in the hands of the inspection bodies dealing with these tasks. In addition, the new revision of EN 12972 dealing with the testing and inspection of tanks is much more specific with regard to welding requirements and makes it quite clear that the inspection bodies involved are responsible for meeting these welding requirements.
- 7. UIP agreed to submit an official proposal reflecting the above to the RID/ADR/ADN Joint Meeting and proposes to amend the text in 6.8.2.1.23 as agreed by the informal working group at its December 2017 meeting:

"The ability of the manufacturer, or the maintenance shop in case of modification or repair, to perform welding operations shall be verified by the inspection body performing the relevant inspection. A weld quality control and assurance system shall be operated by the manufacturer or the maintenance shop performing modification or repair."