
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**

24 September 2021

Geneva, 21 September – 1 October 2021

Item 2 of the provisional agenda

Tanks

Comments on ECE/TRANS/WP.15/AC.1/2021/23/Rev.1

Supplementary information from the informal working group on the inspection and certification of tanks: Proposed amendments to Chapters 6.8 and 6.2, sections 1.8.7 and 1.8.6, plus transitional measures and consequential amendment

Transmitted by the Government of the United Kingdom

1. During discussions on the proposed amendments to 6.2.2.11 and 6.2.3.6.1 some concerns were expressed about the activities of in-house inspection services. As a result, the proposals for 6.8.1.5.3 on supervision of manufacture and 6.8.1.5.4 on initial inspection and tests to allow a manufacturer of service equipment to use an in-house inspection service (IS) were placed in [square brackets] pending further discussion at the Joint Meeting.
 2. The concerns expressed primarily relate to differences in interpretation and implementation as raised by Germany in ECE/TRANS/WP.15/AC.1/2021/31, which also reminds that an IS does not require accreditation for their activities. In discussions with accreditation experts in the United Kingdom, it has also been noted that inspection bodies are not required to be accredited for the surveillance of an IS, and that the independence of inspection bodies may be compromised by no longer being independent of the parties involved.
 3. However, it was recognised that EN ISO 17020:2012 allows inspection bodies to use information supplied by any other party (such as an IS) as part of the inspection process, provided the inspection body can verify the integrity of such information and the inspection body remains responsible for any determination of conformity of the inspected item with the requirements. (This is irrespective of the ownership of the inspected item or indeed whether the information supplied is from an accredited source.)
 4. As further discussion on this issue is likely to be complex and an early solution elusive the United Kingdom would suggest that the said proposals in [square brackets] and potentially other related amendments in Chapter 6.2 be removed until such time that there is agreement on the new requirements for in-house inspection services and their inspection bodies.
 5. The United Kingdom would be happy to host such further discussions if the informal working group on the inspection and certification of tanks is to reconvene or participate in a different forum if established. Either way, the search for a robust approach would benefit from the involvement of accreditation experts in the discussions.
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