

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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

Geneva, 19–27 September 2023

Item 5 (b) of the provisional agenda:

**Proposals for amendments to RID/ADR/ADN:
new proposals**

Proposal for amendment to packing instruction P200 in 4.1.4.1 of RID/ADR to permit the interval between the periodic inspection of LPG cylinders manufactured according EN 14140 to be extended from 10 to 15 years

Transmitted by Liquid Gas Europe

Summary

Executive summary: Transitional measure 1.6.2.9 allows the competent authority (authorities) of the country (countries) where the periodic inspection and the carriage takes place to permit a period of 15 years between periodic inspections for EN 14140 LPG cylinders manufactured before the 1st January 2015. However 4.1.4.1 P200 (12) (1.3) does not currently list EN 14140 as a standard to which the period between periodic inspections may be considered to be extended from 10 to 15 years for cylinders manufactured from the 1st January 2015.

Action to be taken Informal exchange of views on the inclusion of EN 14140 in 4.1.4.1 P200 (12) (1.3), ready for the preparation of a formal detailed proposal for the Spring session.

Related documents:

Background

1. The current edition of the ADR contains a transitional measure in paragraph 1.6.2.9, applicable to pressure receptacles and receptacles for Class 2, as follows: “The provisions of packing instruction P200 (10), special packing provision v of 4.1.4.1 applicable until 31 December 2010 may be applied by Contracting Parties to ADR to cylinders constructed before 1 January 2015.”

2. Therefore, the wording of the ADR 2009 applies to transitional measure 1.6.2.9. In the ADR 2009, the provisions of packing instruction 4.1.4.1 P200 (10), special packing provision ‘v’ are as follows:

“v: *The interval between inspections for steel cylinders may be extended to 15 years:*

(a) *With the agreement of the competent authority (authorities) of the country (countries) where the periodic inspection and the carriage take place; and*

(b) *In accordance with the requirements of a technical code or a standard recognised by the competent authority, or standard EN 1440:1996 “Transportable refillable welded cylinders for liquified petroleum gas (LPG) – Periodic requalification”.*

3. EN 14140 was referenced in the ADR 2009 in chapter 6.2.4 (both EN 14140:2003 and EN 14140:2003+A1:2006) and is currently referenced in the ADR 2023 chapter 6.2.4 (latest version EN 14140:2014+AC:2015), but only cylinders manufactured before the 1st of January 2015 are allowed to have their periodic inspection interval extended to 15 years.

4. The standard EN 14140 was developed by CEN TC286, the same group of experts that developed EN 1442 (Transportable refillable welded steel cylinders for LPG - Design and construction). EN 14140 provides an equivalent level of safety and quality to those designed and manufactured in accordance with EN 1442. EN 14140 was first published in 2003 and has been subjected to several improvements by amendments, corrigenda and revisions, resulting in EN 14140:2014 + AC:2015, which is referenced in the ADR 2023.

5. A significant number of EN 14140 cylinders have entered service since 2009, with only those manufactured before the 1st of January 2015 allowed to be marked P15Y. A high number of EN 14140 cylinders manufactured between 2003 and 2008 have been allowed to have a 15-year period between periodic inspections and no safety issues have been recorded.

6. EN 16728:2016+A2:2020 is now the current standard for the periodic inspection of EN 14140 designed and manufactured cylinders. This standard has been updated, a number of times, improving the safety and quality of the periodic inspection of these cylinders.

7. LPG of a quality mandated by 4.1.4.1 P200 (12) (2.5) does not cause internal corrosion in steel cylinders and the external surfaces of these cylinders are checked each time before they are filled for both corrosion and physical damage.

Draft proposal

8. Amend P200 (12) (1.3) in 4.1.4.1 as follows (new text is shown in bold, underlined):

“1.3 Cylinders manufactured since 1 January 1999 shall have been manufactured in conformity with the following standards:

- EN 1442; or
- **EN 14140; or**
- EN 13222-1; or
- Annex I, parts 1 to 3 to Council Directive 84/527/EEC

as applicable according to the table in 6.2.4.

Other cylinders manufactured before 1 January 2009 in conformity with ADR in accordance with a technical code accepted by the national competent authority may be accepted for a 15 year interval, if they are of equivalent safety to the provisions of ADR as applicable at the time of application ”.
