

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

5 September 2023

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

Geneva, 19–27 September 2023

Item 2 of the provisional agenda:

Tanks

Request for opinion on clause 5.8.3 of EN 12972 regarding tank leakproofness test pressure

Transmitted by the Government of Poland

Introduction

1. The provisions of RID/ADR in 6.8.2.6.2 regarding the type examination, inspection and test of tanks refer to *EN 12972:2018 - Tanks for transport of dangerous goods – Testing, inspection and marking of metallic tanks*. The use of a referenced standard is mandatory for the testing and inspection of tanks for the transport of dangerous goods.
2. Point 5.8.3 of the PN-EN 12972 standard entitled " Leakproofness test pressure " contains the following sentence at the end: "Internal leakproofness of shut-off devices shall be tested at the leakproofness test pressure as well as at a pressure of not more than 0,2 bar.". The expression "as well as at a pressure of not more than 0.2 bar" is incomprehensible to us.
3. We are wondering how to implement this requirement in practice in the context of RID/ADR regulations regarding the leakproofness test provided in 6.8.2.4.3 of RID/ADR.
4. It is emphasized in 6.8.2.4.3 of RID/ADR that the pressure of the leakproofness test, irrespective of the test medium (liquid or gas), shall not be lower than 0.2 bar.
5. A comparison of the provisions in 6.8.2.4.3 of RID/ADR and in clause 5.8.3 of EN 12972 shows the inconsistency of these findings.
6. Poland considers that in this situation the provisions of section 1.1.5 of the ADR on the application of standards should be applied, which state:

“Where the application of a standard is required and there is any conflict between the standard and the provisions of ADR, the provisions of ADR take precedence. The requirements of the standard that do not conflict with ADR shall be applied as specified, including the requirements of any other standard, or part of a standard, referenced within that standard as normative.

NOTE: A standard provides details on how to meet the provisions of ADR and may include requirements in addition to those set out in ADR.”.
7. Therefore, in the opinion of Poland, in the discussed case, the requirements contained in 6.8.2.4.3 of RID/ADR should be applied, i.e. the last sentence in 5.8.3 of the EN 12972 standard should read as follows:

"Internal leakproofness of shut-off devices shall be tested at the leakproofness test pressure, **but not less than 0.2 bar.**"
8. Poland asks the Joint Meeting to take a position on this matter.