

**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, 22–26 March 2010

Item 3 of the agenda

**Standards**

**Consolidated comments by Members of the Joint Meeting on  
draft standards dispatched by CEN since the last session**

**Transmitted by the European Committee for Standardisation (CEN)**

1. Reference is made to document ECE/TRANS/WP.15/AC.1/2009/32, which informs about the progress made in the establishment of new and the revision of published EN and EN ISO standards referenced or intended to be referenced in the RID/ADR/ADN. It invites Members of the Joint meeting to comment on draft standards at enquiry and formal vote stage, provided on the dedicated CEN internet-site.
2. Since the last session of September 2009, three dispatches of seven draft standards together with assessments by the CEN consultant were made available with deadlines 31 October 2009, 31 January and 15 February 2010. All comments received are consolidated in this document.
3. The Working Group on Standards discussed this paper during the March 2010 session. The revised version of this document includes the comments agreed by this Group. These comments need to be considered by the relevant standardizing bodies for the further preparation of the standards as conditional for their adoption for reference in RID/ADR/ADN.
4. Proposals on the amendment of RID/ADR/ADN to become effective by 1.1.2013 are part of the separate meeting report of the Working Group on Standards (**INF.41**).

## A. Standards at Stage 2: Submitted for Public Enquiry

Dispatched by CEN on 21.12.2009

prEN 13110	LPG equipment and accessories – Transportable refillable welded aluminium cylinders for liquefied petroleum gas – Design and construction	Where to refer in RID/ADR/ADN: 6.2.4	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4		
<p>Assessment by CEN consultant published on 4.1.2010</p> <p>Summary of conclusions:  <i>The text of prEN 13110 doesn't contradict to the provisions of RID/ADR/ADN 2009 and to the issue adopted to become effective January 1, 2011. Some improvements are recommended to be considered for the preparation of the formal vote text – see clause 5.1 and the Annex to this assessment, using the CEN electronic balloting commenting template.</i></p> <p>Proposed follow-up action:  <i>This standard needs to be discussed by the STD's WG as a replacement EN 13110:2002 in RID/ADR, subsection 6.2.4, Table, under design and construction.</i></p>					
<b>Comments from members of the Joint Meeting:</b>					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	General	Type approvals based on the 2002 version should continue to expiry.		No objections	Supported; to be finally decided for the FV- version of the standard.
UK	General	The shortcomings noted by the CEN Consultant should be corrected.		./.	To be considered for the preparation of the FV- version.
CH		General agreement with the CEN consultant. A final judgment will only be possible when these recommendations have been applied, specially the missing links. In addition, the German version has some translation errors		FV issue will be subject to comments by the Group. "Missing links" is unclear. Translation errors need to be handed over to editing board.	As above; The "missing links" (references to nowhere) are also addressed in the assessment of the CEN consultant. Corrections are required for the FV- version of the standard.
CH	7.6.2.2	This sentence is not understandable		To be considered for the VF version.	Better wording is recommended.

CH	4.2	As there is a possibility that AlMgSi1 has a Manganese content of less than 0.5%, the chemical composition of this material must be changed or, if in the production a material is used with less than 0.5% Manganese the tests in accordance to Annex A must be carried out. (ADR/RID6.2.3.4.2)		4.3 of the standard refers to EN ISO 11114-1 and EN 12862 for unalloyed aluminium or alloys other than those in Table 1. As UN 1965 is not included in EN ISO 11114-1 it's questionable whether inter-crystalline corrosion of the inside wall is relevant for LPG.	The WG considers this as a non-compliance with the wording of RID/ADR 6.2.3.4.2 to be considered with the effect that the possible intercrystalline corrosion is also tested for the Aluminium alloys in question..
CH		How is ADR 6.2.3.1.3 guaranteed?		6.2.3.1.3 requires that an adequate impact strength at an ambient temperature of -20 °C can be guaranteed. It's a technical issue whether the metals specified in the standard comply with this requirement.	The WG is aware of the fact that aluminium alloys are generally not vulnerable to low temperatures and that ADR 6.2.3.1.6 is automatically guaranteed because of the properties of aluminium alloys at low temperatures.

### B. Standards at Stage 3: Submitted for Formal vote

Dispatched by CEN on .9.11.2009

prEN ISO 14245	Gas cylinders – Specifications and testing of LPG cylinder valves – Self closing (ISO 14245:2006)	Where to refer in RID/ADR/ADN: 6.2.4	Applicable sub-sections and paragraphs: 6.2.3.3
<p>Assessed by CEN consultant on 4.9.2009</p> <p>Summary of conclusions:  <i>prEN ISO 14245:2009 complies with the relevant provisions of RID/ADR 2009 and is considered a candidate to be taken into reference instead of EN 13153:200 and EN 13153:2001+A1:2003. It can be approved.</i>  <i>A few improvements of editorial nature are required in the European foreword – see clause 3.3 and the Annex to this assessment, using the CEN electronic balloting commenting template.</i></p> <p>Proposed follow-up action:  <i>This standard needs to be discussed by the STD's WG as a replacement of the existing reference as a replacement of EN 13152:2001 and EN 13153:2001+A1:2003 in RID/ADR, section 6.2.4.</i></p>			

<b>Comments from members of the Joint Meeting:</b>					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	Text in Foreword proposed by CEN Consultant	Reference to CE marking should be deleted. TPED (Article 3.4) only allows the use of CE marking where RID/ADR does “not contain any detailed technical provisions for the valves ...”. This standard provides the necessary detailed technical provisions so Pi marking only is required.	“... (TPED) requires that valves shall bear the $\pi$ - or CE-mark marking.”	Correct; agree with proposed amendment.	The WG agrees that a CE marking for valves for transportable pressure receptacles is not allowed.
UK	5.18 (editorial)	The tolerance on 65 deg C is double that specified in Table 1.	Correct tolerance to +2.5/-2.5 after 65	Support harmonization; note that tolerance for low temp. test is 0/-5°C.	To be considered for the preparation of the final text.
UK	5.19 (editorial)	The temperature is stated as a positive number and should be -20 according to Table 1	Insert - before 20	Correct; need to be amended.	
UK	Whole standard	No other comments – recommended for referencing. Existing type approvals can continue to their expiry.		./.	Agreed. See separate text (INF.41, Report of WG STD’s) for the amendment of RID/ADR to become effective 1.1.2013
CH		In the FprEN version the proposed amendments are not included!		Editorial amendments will be considered prior to publication.	Comment withdrawn.
CH		If this standard is accepted, the latest date for withdrawal of EN 13152 must be changed		Correct; will be part of WG proposal.	Agreed. See separate text (INF.41, Report of WG STD’s) for the amendment of RID/ADR to become effective 1.1.2013
CH		If this standard is accepted P200 (12)/3.4 has to be complemented		Comment refers to the 2011 text of RID/ADR and is concerned with cylinders having granted a 15 years interval. Need to be discussed.	
<b>Decision of the STD’s WG:</b>		<b>Accepted</b> <del>Refused</del> <del>Postponed</del>	<b>Comments</b> Amendments to be considered as indicated above (last column)	<b>Proposed transition regulation</b> See WG report (INF.41)	

prEN ISO 15995	Gas cylinders – Specifications and testing of LPG cylinder valves – Manually operated (ISO 15995:2006)	Where to refer in RID/ADR/ADN: 6.2.4	Applicable sub-sections and paragraphs: 6.2.3.3		
<p>Assessed by CEN consultant on 4.9.2009</p> <p>Summary of conclusions:  <i>prEN ISO 15995:2009 complies with the relevant provisions of RID/ADR 2009 and is considered a candidate to be taken into reference instead of EN 13153:2001 and EN 13153:2001+A1:2003. It can be approved.</i>  <i>A few improvements of editorial nature are required in the European foreword. ....</i></p> <p>Proposed follow-up action:  <i>This standard needs to be discussed by the STD's WG as a replacement of the existing reference as a replacement of EN 13152:2001 and EN 13153:2001+A1:2003 in RID/ADR, section 6.2.4.</i></p>					
<b>Comments from members of the Joint Meeting:</b>					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	Text in Foreword proposed by CEN Consultant	Reference to CE marking should be deleted. TPED (Article 3.4) only allows the use of CE marking where RID/ADR does “not contain any detailed technical provisions for the valves ...”. This standard provides the necessary detailed technical provisions so Pi marking is required.	“... (TPED) requires that valves shall bear the π - or CE-mark marking.”	Correct; agree with proposed amendment.	The WG agrees that a CE marking for valves for transportable pressure receptacles is not allowed.
UK	5.19 (editorial)	The tolerance on 65 deg C specified in table 1 should be included.	Insert +2.5/-2.5 after 65	Support harmonization; note that tolerance for low temp. test is 0/-5°C.	To be considered for the preparation of the final text.
UK	5.20 (editorial)	The temperature is stated as a positive number and should be -20 according to Table 1	Insert - before 20	Correct; need to be amended.	
UK	Whole standard	No other comments – recommended for referencing. Existing type approvals can continue to their expiry.		./.	Agreed. See separate text (INF.41, Report of WG STD's) for the amendment of RID/ADR to become effective 1.1.2013
CH		In the FprEN version the proposed amendments are not included!		Editorial amendments will be considered prior to publication.	Comment withdrawn.
CH		If this standard is accepted, the latest date for withdrawal of EN 13153 must be changed		Correct; will be part of WG proposal.	Agreed. See separate text (INF.41, Report of WG STD's) for the amendment of RID/ADR to become effective 1.1.2013
CH		If this standard is accepted P200 (12)/3.4 has to be complemented		Comment refers to the 2011 text of RID/ADR and is con-	

				cerned with cylinders having granted a 15 years interval. Need to be discussed.	
<b>Decision of the STD's WG:</b>	Accepted Refused Postponed	<b>Comments</b> Amendments to be considered as indicated above (last column)		<b>Proposed transition regulation</b> See WG report (INF.41)	

Dispatched by CEN on .9.11.2009

<b>prEN ISO 9809-1</b>	<b>Gas cylinders — Refillable seamless steel gas cylinders - Design, construction and testing</b> <b>Part 1: Quenched and tempered steel cylinders with tensile strength less than 1 100 MPa (ISO/DIS 9809-1: 2008)</b> <b>Part 2: Quenched and tempered steel cylinders with tensile strength greater than or equal to 1 100 MPa (ISO/DIS 9809-2: 2008)</b> <b>Part 3: Normalized steel cylinders (ISO/DIS 9809-3: 2008)</b>	<b>Where to refer in RID/ADR/ADN:</b> <b>6.2.4</b>	<b>Applicable sub-sections and paragraphs:</b> <b>6.2.3.1 and 6.2.3.4</b>		
<b>prEN ISO 9809-2</b>					
<b>prEN ISO 9809-3</b>					
Assessed by CEN consultant on 4.9.2009 Summary of conclusions: <i>The text of this version of EN ISO 9809-1:2009 conforms to the provisions of RID/ADR/ADN. The comments on the first UAP text have adequately been taken into account.</i> <i>A number of improvements are recommended prior to publication ...</i> Proposed follow-up action: <i>This standard needs to be discussed by the STD's WG as a candidate to be referred to in the table in 6.2.4 RID/ADR "for design and construction" as a replacement (together with EN ISO 9809-3) for EN 1964-1:1999.</i>					
<b>Comments from members of the Joint Meeting:</b>					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	All three standards	The standards do not represent a significant safety improvement over EN 1964-1 and EN 1964-2, so type approvals should continue to their expiry.		To be considered for the transition regulation below.	Agreed. See separate text (INF.41, Report of WG STD's) for the amendment of RID/ADR to become effective 1.1.2013
UK	All three standards	No comments – recommended for referencing with the suggested editorial changes proposed by the CEN Consultant included.		./.	To be considered for the preparation of the printed version.

CH		No EN Version available!!		Under the Vienna agreement ISO is in charge to provide for the European Annex (if any). This is done in the dispatched text as “Annex NA” which, however does not appear in the table of contents.	See text in next line.
<p>The WG STD’s states that the working procedures followed in this case are fully inadequate to arrive at a serious judgement on the compliance of this standard series with the regulations. In particular, it is required for the purpose of discussion by the WG STD’s that a full copy of the draft EN ISO standard including European cover sheet, foreword and Annex (if foreseen) is provided to the delegates. The camouflaged inclusion of the European Annex in the ISO-text, not mentioned in the table of contents is considered as confusing, misleading and not acceptable (last but not least also for the ISO users). The Chairman of the STD’S WG and CEN Consultant was encouraged to put these complaints forward to CEN and ISO in writing.</p>					
CH		It is difficult to find all the documents mentioned in the CEN consultants assessment because there are no links to them.		It is recalled that Members have permanent access to all concerned standards and related assessments on the dedicated Lifelink webpage <a href="http://cen.iso.ch/livelink/livelink.exe">http://cen.iso.ch/livelink/livelink.exe</a> . However, normative references are not included. The consultant is prepared for assistance.	The Consultant feels encouraged to improve traceability and reader- friendliness of his assessments.
CH	ISO- part, 11.2.1, Hydraulic press. test	The test procedure fails to include that the pressure source shall be separated from the cylinder, once the pressure level is reached to avoid re- pressurizing after a pressure drop			Technical issue; to be considered for future revisions in this and similar standards.
CH	Annex NA, 13, Marking	The text of this clause does not comply with the conclusion of the Standards Working Group on the referencing of EN ISO 13769			It was agreed that the standard shall follow the proposed text for all standards were this standard is referred to. This text was reproduced in resolution 39/5 of CEN/TC 023. The WG asks ISO and CEN to

					reconsider the need of EN ISO 13769 in view of the comprehensive coverage of marking requirements for UN- and non-UN pressure receptacles and would support an approach by ECMA and EIGA to pursue this goal.
CH	Annex NA, B2, Note	The last part of the Note is not operable and should be deleted. (The mutual acceptance of EN and ISO qualification schemes is not part of the ISO- text).			The WG supports the amendment of the Note as proposed.
<b>Decision of the STD's WG:</b>		<b>Accepted</b> <b>Refused</b> <b>Postponed</b>	<b>Comments</b> Editorial amendments to be considered as indicated above (last column)	<b>Proposed transition regulation</b> See WG report (INF.41)	

<b>prEN ISO/FDIS 10156:2009</b>	<b>Gases and gas mixtures – Determination of fire potential and oxidizing ability for the selection of cylinder valve outlets (ISO/FDIS 10156:2009)</b>	<b>Where to refer in RID/ADR/ADN: 2.2.2.1</b>	<b>Applicable sub-sections and paragraphs: 2.2.2.1</b>		
Assessed by CEN consultant on 2.12.2009 Summary of conclusions: <i>There are no non- conformances between ISO/ FDIS 10156:2009. My comments on the enquiry text of the EN version are no longer relevant in the absence of a text for the final EN version.</i> <i>A few points need to be taken into account for the preparation of the European issue....</i> Proposed follow-up action: <i>This standard needs to be discussed by the STD's WG as a replacement ISO 10156:1996 and ISO 10156-2:2005 in RID/ADR/ADN, subsection 2.2.2.1.</i>					
<b>Comments from members of the Joint Meeting:</b>					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	Foreword	The Foreword understates the changes.	Insert at end of Foreword: "Part 5 covering mixtures containing oxygen and flammable gases is new."	Supported	WG STD'S support the extended description of the changes. Generally these descriptions facilitate the assessment of compliance with the regulations, transition regulations, in particular.



UK	General	This standard is referenced in the UN Model Regulations and should be proposed for adoption to the UN Sub Committee of Experts – Transport of Dangerous Goods. Some adaptation of the text in 2.2.2.1 (b) and 2.2.3 (d) will be required.	ISO to make a proposal when the standard is published?	./.	The WG encourages UK to bring this case to the UN Subcommittee of Experts on TDG.
UK	General	The standard is used for classification in Chapter 2.2 of RID/ADR/ADN and is not relevant to construction type approvals. Only the general 6 months transition should be allowed when the standard is introduced.		Agree.	No transition regulation is deemed required to be added to RID/ADR/ADN.
CH		A discussion will only make sense if the EN Version is available. The provided version is incomplete (missing pictures)		There are no European deviations from the ISO text. If pictures are not reproduced they are identical with the ones of the previous edition of the standard.	As already stated for the standard series EN ISO 9809 the WG underlines the need to be provided with complete drafts of the European version of the standards, including any drawings. Together with the expectation that the revised ISO standard will be referenced in the UN Model regulations first, the incomplete information leads to a postponement of the decision.
<b>Decision of the STD's WG:</b>		<b>Accepted</b> <b>Refused</b> <b>Postponed</b>	<b>Comments</b>		<b>Proposed transition regulation</b> No decision taken