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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 2009

Item 5 (b) of the provisional agenda

Proposals for amendments to RID/ADR/ADN

New proposals

Unannounced inspections with sampling during manufacturing of pressurized containers

Transmitted by the Government of France^{1,2}

Summary

Executive summary: This document is intended to add a requirement for the relevant bodies to undertake unannounced inspections with sampling throughout the manufacturing process for pressurized containers.

Action to be taken: Add a new provision to 1.8.7.3.

¹ In accordance with the programme of work of the Inland Transport Committee for 2006–2010 (ECE/TRANS/166/Add.1, programme activity 02.7 (c)).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2010/12.

Introduction

1. Pursuant to 1.8.7.3.3, “The relevant body shall:
 - (a) Verify the conformity with the technical documentation specified in 1.8.7.7.2;
 - (b) Verify that the manufacturing process produces products in conformity with the requirements and the documentation which apply to it;
 - (c) Verify the traceability of materials and check the material certificate(s) against the specifications;
 - (d) As applicable, verify that the personnel undertaking the permanent joining of parts and the non-destructive tests are qualified or approved;
 - (e) Agree with the applicant on the location where the examinations and necessary tests are to be carried out; and
 - (f) Record the results of its survey.”
2. With a view to improving the safety of pressurized containers, we would suggest adding an additional requirement for the relevant bodies, requiring them to undertake unannounced inspections of the manufacturers, with sampling and testing, throughout the manufacturing process. We have recently encountered problems relating to the conformity of some valves that in our opinion could have been avoided if such a requirement existed. It is important to act based on our experience in the field.
3. The measures set out in 1.8.7.3 do not call for unannounced inspections with sampling, which would ensure verifications as stipulated by 1.8.7.3.3 (b).
4. Accordingly, we suggest adding an additional clause to 1.8.7.3.

Proposal

5. In RID/ADR, add to 1.8.7.3 a new 1.8.7.3.4, to read as follows:

“1.8.7.3.4 In order to ensure that products are in conformity with the requirements and the documentation which apply to them, the relevant body shall undertake, at least once a year, unannounced inspections of the manufacturer’s facilities, including sampling and testing, throughout the manufacturing process for pressurized containers.”

Justification

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| Safety: | The proposal is being made in response to problems identified in France relating to the conformity of valves. The proposal will make pressurized containers safer. |
| Feasibility: | No problem |
| Practical implications: | Ensure implementation of certain compulsory verifications set out in 1.8.7.3.3. |