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, 21-25 March 2011
Item 3 of the provisional 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.1/2011/22, 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 2010, two dispatches of eleven draft standards together with assessments by the CEN consultant were made available on the dedicated CEN website.

3. Deadlines for comments were set for the first dispatch dated 13 December 2010 as by 31 January 2011 for the document out for Formal Vote and by 28 February 2011 for those out for Enquiry.

4. For the second dispatch, dated 25 February 2011 the deadline for comments is 18 March 2011.

5. This document is intended to inform about the comments received on the first dispatch. A revised issue of this document including the comments on the second dispatch will be made available at the beginning of the Session.

Please recycle

Annex

A.Standards at Stage 2: Submitted for Public Enquiry

Dispatched by CEN on 14.12.2010 [English only]

prEN ISO 11372 WI 023157	**Gas cylinders - Acetylene cylinders – Filling conditions and filling inspection (ISO/DIS 11372:2010)**	**Where to refer in RID/ADR: 4.1.4.1, P200 (11)**	**Applicable sub-sections and paragraphs**: **4.1.4.1 P200 (5) d and p**

Assessed by CEN consultant on 23.8.10

Summary of conclusions:

prEN ISO 11372 can be promoted to the formal vote stage. Some improvements are recommended.

It is candidate for reference in RID/ADR..

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as a replacement of EN 1801:1998, EN 12754:2001in RID/ADR/ADN, subsection 4.1.4.1, P200 (11).

Comments from members of the Joint Meeting:

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		Comments of the CEN Consultant supported			

prEN 16119 WI 286122	**LPG equipment and accessories – Sealing caps and plugs for cylinder and tank valves – Specification and testing**	**Where to refer in RID/ADR: 6.8.2.6**	**Applicable sub-sections and paragraphs**: **6.8.2.2**

Assessed by CEN consultant on 5.11.2010

Summary of conclusions:

prEN 16119 can be promoted to the formal vote stage. Some improvements are recommended.

It is considered to be a candidate for reference in RID/ADR/ADN with respect to the provisions on tank vehicles and tank wagons but not for pressure receptacles.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as a candidate for reference in RID/ADR, subsection 6.8.2.6.

Comments from members of the Joint Meeting:

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK 1	3.1.7	Under CEN rules definitions are limited to one sentence; properties that may be present are not elements of a definition.	Delete the second, third and fourth sentences.	These comments are valuable contributions to the improvement of the	

UK 2	3.2	Delete the square brackets because their meaning is unclear. These values need to be stated explicitly since they are not shared by other technologies.	Introduce a definition of Standard temperature and pressure clause in 3.1	draft with respect to correctness, completeness, consistency and compliance with CEN drafting rules. They are supported and need to be considered for the preparation of the FV- draft. The compliance with RID/ADR requirements is not questioned by these comments.	
UK 3	4	Does this clause not apply to plugs?	Start the clause "Caps **and plugs** designed in accordance …"		
UK 4	4	The sentences "Temperatures below this/above 65 ^{o}C are acceptable for short periods" has no place in a standard. In what sense acceptable? For how long? By how much lower/higher?	Delete these sentences or frame them with dimensions so judgements can be made.		
UK 5	7.2.2	Punctuation required before the word 'volume' in the two lines "Variation after immersion/drying"	Insert comma as in 7.3.2		
UK 6	7.2.5	What are 'sample valves'? How many are there? How many caps or plugs are tested? Are they subjected to the test pressure? Have they been subjected to any or all of the previous tests?	Explain		
UK 7	7.2.5	In line 1, replace 'vat' with 'at'			
UK 8	7.2.6.6 & 7.2.6.7; 7.3.6.6 & 7.3.6.7	There is no leak tightness check in 6.3, only a required maximum leak rate.	End the sentence "…checked that it meets the leak tightness requirement of 6.3"		
UK 9	7.2.7.2	'Consecutively' seems an unnecessary word	Delete or explain what the operation is consecutive to.		
UK 10	7.3.5	Same comments as 7.2.5			
UK 11	7.3.7.2	Same comments as 7.2.7.2			
UK 12	8 & 9	Why are plugs not subject to marking or documentation requirements?			
UK 13	Annex A	No requirements in text for plugs. Also, this annex is referred to normatively in Clause 4. How can it be informative?			
UK 14	A.2	What is this valve? Does it have a cap fitted?			
UK 15	Annex B	This annex is referred to normatively in Clause 4. How can it be informative?			
UK 16	Annex B	The table describes a 24 hour (1440 minute) cycle. How is this related to the 168 hours mentioned in 7.2.4 and & 7.3.4 or to the 1 000 hours and 24 hours mentioned in the legend to table B1?	Explanatory text needed.		

prEN 14334	**LPG equipment and accessories – Inspection and testing of LPG road tankers**	**Where to refer in RID/ADR: 6.8.2.6**	**Applicable sub-sections and paragraphs: 6.8.2.4 (except 6.8.2.4.1) and 6.8.3.4**
WI 286130			

Assessed by CEN consultant on 25.11.2010

Summary of conclusions:

Due to the nature and extent of the non- compliances with the text of the ADR as to become effective by 1.1.2011 a promotion to the formal vote level cannot be supported. Significant improvements are required.

The most significant non- compliance is the alternative to the hydraulic pressure test in terms of different options of non- destructive test methods. Such replacement has already been adopted for pressure receptacles and it is assumed that an application for the introduction of this option is submitted also for tanks. If this submission would be prepared for the March 2011 session it could then become effective for the 2013 issue of ADR.

A series of other deficiencies have been detected and need to be addressed. Details are given in the Annex to this assessment.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG for reference in ADR 6.8.2.6, Table, under "For Tanks for Class 2" and related to subsections 6.8.2.4 (except 6.8.2.4.1) and 6.8.3.4..

Comments from members of the Joint Meeting:

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
D 1	General	For inspection of all tank types we have already EN 12972 listed in RID/ADR. To avoid confusion and redundancy we would prefer to merge both standards (add the LPG specific parts in EN 12972). At the moment the standard is not acceptable for RID/ADR because of the possible replacement of the hydraulic pressure test by NDT.		This is a serious issue. Also under CEN rules competing standards on the same subject shall be avoided.	
F 1	General	When CEN/TC286 started to draft a standard on the inspection and testing of LPG road tankers we were not in favour of a duplication of the work since EN12972 covers all tanks including LPG tanks. EN 12972:2001 has been referred in RID/ADR in 2003.Since 2009, EN 12972:2006 is mandatory for all tanks including LPG tanks. If there is a need for specific provisions for LPG tanks, they can be proposed for inclusion in EN12972.			

Nl 1	General	We do NOT support the reference to this standard because there is already a reference to EN 12972 in ADR for testing of all kind of tanks except for tanks for refrigerated gases. The EN 14334 addresses only tanks for UN 1965 and UN 1075 while in general tanks for transport of under pressure liquefied flammable gases are approved for a wider range of gases than only UN 1965 and UN 1075. The reference would therefore be mere symbolic, bring confusion for users and testing bodies. Besides this we are of the opinion that the standard offers hardly any additional value over the EN 12972.			
UK 1	1	Some words seem to be missing from the second sentence. Suggested insertion is shown underlined in the next column.	'…of a tank, see EN 12493 or <u>for service equipment on</u> the road tanker see EN 12252.'	Supported (EN 12252 deals with the equipping of LPG road tankers)	
UK 2	4 Para 2	We do not support the allocation of responsibility as suggested by the CEN Consultant. Standards usually specify the tests/inspections and the regulations specify who does them, in this case the conformity assessment requirements of ADR 6.8.4-TT9 and 1.8.7	This is a change from the recent decisions of the Standards WG which have added similar text. Standards WG to discuss, please.	My comment is based on the fact that the standard specifies "the inspector" who is allocated to various functions in the standard. It seems logical to refer to him at this important place.	
D 2	4, Table 1	Intermediate inspection in accordance to RID/ADR includes also all of the tank equipment.		In fact, ADR 6.8.2.4.3 includes the intermediate inspection of "shells and their equipment". The standard is not compliant with this regulation.	
Nl 2	4, Table 1	In the table 1 the items "tank accessories" (service equipment) and "Vehicle LPG equipment" (filling and discharge piping and closing system for unintended movement of tank and fire) are not to be inspected during intermediate inspections. Inspection of these items is however part of the intermediate inspection in ADR (check of the satisfactory operation in paragraph 6.8.2.4.3 of ADR).			
Nl 3	5.3	If wall thickness reduction is expected due to corrosion or other causes the wall thickness needs to be checked and if below the calculated minimum wall thickness this is a rejection criteria. This is however not included in this article.		Need to be considered to achieve compliance with ADR.	

D 3	5.4.4.2	Rejection criteria – According to RID/ADR it is in no case permitted that corrosion defects can go under the limit of the required minimum wall thickness. This should be stated clearly in the standard.			
Nl 4	5.4.4.2, Table 2	An isolated pitting of 0.6 mm below the minimum calculated wall thickness is allowed in the standard. This is not foreseen in ADR. In the case this would be approved it should not be a fixed value but a relation to the minimum calculated wall thickness. In this case also the definition of “Isolated“ should be defined.		Need to be considered to achieve compliance with ADR.	
Nl 5	5.5.8	Acoustic emission testing is not a option in ADR and cannot be used as mentioned in this standard.		Correct! However, if the standard describes experienced praxis in some member states compliance may also be achieved by an amendment of ADR.	
UK 3	5.6.2	Second paragraph (after the three indents); the term requalified needs to be defined or explained by specifying the process intended.	Set out the requirements of requalification	Supported.	
Nl 6	5.7.4	The approval criteria in the standard for leakage is - detection with soapy water. Detection with soapy water is only suitable for relative small leaks. The text needs improvement.		Technical issue to be discussed by the CEN WG.	
Nl 7	6.2	According to the standard the tankplate should only be marked after the periodic inspection. ADR also prescribes marking after the intermediate inspection.		Correct; need to be amended to comply with ADR 6.8.2.5.1, 9th indent.	
UK 4	Bibliography	EN 13554 is listed as a normative reference and is not needed in the Bibliography	Delete EN 13554	Editorial	
UK 5	General	Comments of the CEN consultant supported – except clause 4 paragraph 2 noted above.			

prEN ISO/DIS 11120.2	Gas cylinders – refillable seamless steel tubes of water capacity between 150 l and 3000 l –Design construction and testing (ISO/DIS 11120.2)	Where to refer in RID/ADR: 6.2.4.1	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4
WI 023135			

Assessment by CEN consultant on 3.1.2011

Summary of conclusions:

There is no clause in prEN ISO 11120 which would contradict the relevant provisions of RID/ADR UN- and non-UN pressure receptacles.

However, it doesn't address all RID/ADR provisions related to the construction and testing of pressure tubes adequately and in full as it is required for a standard referenced for the design and inspection of non-UN pressure receptacles. An Annex with common European modifications was not provided and is still considered as indispensable. A larger number of improvements are required and detailed amendments are proposed.

EN ISO 11120 is proposed as a replacement of the existing reference in RID/ADR 6.2.4.1, Table, under "for design and construction" and related to subsections 6.2.3.1 and 6.2.3.4.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as a replacement of the existing reference in RID/ADR 6.2.4.1, Table, under "for design and construction" and related to subsections 6.2.3.1 and 6.2.3.4.

Comments from members of the Joint Meeting:

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		Comments of the CEN Consultant in his assessment document (dated 3.1.2011) supported			

Dispatched by CEN on 25.2.2011

EN ISO 7225:2005+prA1	Gas cylinders – Precautionary labels, Amendment 1	Where to refer in RID/ADR: 5.2.2.2.1.2	Applicable sub-sections and paragraphs: 5.2.2.2.1.2
WI 023159			

Assessment by CEN consultant on 13.2.2011

Summary of conclusions:

EN ISO 7225:2005+prA1 can be promoted to the final vote stage.

The amendment has no impact on the existing reference to this standard in RID/ADR. However, it is questioned whether this reference, restricted to the aspects reduced size and overlapping of labels should be replaced by an amendment of UN/RID/ADR.

Options of improvement of ISO 7225 are recommended which could be included either in the amendment or in the next revision process.

Proposed follow-up action:

Standard and proposed amendment need to be discussed by the Standards Working Group as a replacement of the existing reference to ISO 7225 in RID/ADR 5.2.2.2.1.2.

Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards

prEN ISO 14246	**Gas cylinders – Cylinder valves – Manufacturing test and examinations**	**Where to refer in RID/ADR: 6.2.4.1**	**Applicable sub-sections and paragraphs: 6.2.1.5 ??**
WI 023151			

Assessment by CEN consultant on 18.2.2011

Summary of conclusions:

prEN ISO 14246 can be promoted to the final vote stage.

It is considered to be a candidate for reference in UN/RID/ADR. However, improved text of UN/RID/ADR is recommended to introduce essential requirements on the subject of the standard.

A merger with EN ISO 10297 should be considered.

There is seen no need for European modifications.

Proposed follow-up action:

This standard should be discussed by the Group with respect to a recommendation on both – possible amendments of RID and ARD (and in the UN Model regulations) and its reference in these regulations.

Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards

prEN ISO/DIS 13274	Packaging – Transport packaging for dangerous goods – Plastics compatibility testing for packaging and IBCs	Where to refer in RID/ADR: 6.1.5.2	Applicable sub-sections and paragraphs: 6.1.5.2.
WI 261393			

Assessment by CEN consultant on 23.2.2011
Summary of conclusions:

prEN ISO/DIS 13274 can be promoted to the formal vote stage. Essential improvements are required.
As a merger of prEN ISO 13274 and prEN ISO 23667 having been subject to discussion by the STD's WG prEN ISO 13274 follows its recommendations adequately. It is a candidate for reference in RID/ADR.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as a candidate for reference in RID/ADR.

Comments from members of the Joint Meeting:

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards

prEN ISO/DIS 16495	Packaging – Transport packaging for dangerous goods – Test methods	Where to refer in RID/ADR: 6.1.5.1	Applicable sub-sections and paragraphs: 6.1.5.1
WI 261392			

Assessment by CEN consultant on 13.2.2011
Summary of conclusions:

prEN ISO/DIS 16495 can be promoted to the formal vote stage. Essential improvements are recommended.
It is a candidate for reference in RID/ADR. However, it is recommended that ISO 16495 is first moved to the UN level as a candidate to be referenced in the UN Model regulations.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as a candidate for reference in RID/ADR.

Comments from members of the Joint Meeting:

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards

B.Standards at Stage 3: Submitted for Formal vote

Dispatched by CEN on 14.12.2010 [English only]

FprEN ISO 7866	**Gas cylinders – refillable seamless aluminium alloy gas cylinders (ISO/DIS 7866:2007)**	**Where to refer in RID/ADR: 6.2.4.1**	**Applicable sub-sections and paragraphs: 6.2.3.1.and 6.2.3.4**
WI 023118			

Assessed by CEN consultant on 9.12.2010

Summary of conclusions:

There are no non-compliances between FprEN FDIS 7866 and RID/ADR/ADN 2011, except for the allowance in the standard to replace the hydraulic pressure test by the volumetric expansion test.

This may lead to a restricted reference, excluding this option.

Comments by the Standards Working Group on the second enquiry text of the standard and of my negative assessment of the first FV text been addressed to some extent. Some clauses fail to cope with those in comparable standards, such as the EN ISO 9809 standard series.

Additional editorial deficiencies were detected – both in the ISO part and the European Annex which need to be corrected prior to printing (see Annex to this assessment).

Proposed follow-up action:

This standard needs to be discussed by the Working Group on Standards for reference in RID/ADR 6.2.4.1, Table, under "for design and construction" and related to subsections 6.2.3.1 and 6.2.3.4.

Comments from members of the Joint Meeting:

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK 1	11.1	Both the hydraulic pressure test and the volumetric expansion test are permitted. This is in conformity with RID/ADR 2013 in which 6.2.3.4.1 is amended to align completely with 6.2.1.5. (See report of Joint Meeting March 2010.)	None	Correct! The assessment didn't consider this recent amendment.	
UK 2	Annex I, 11.2	Given the above change, the mention of RID/ADR precedence in this clause will become unnecessary; it is required however, when the standard is published in 2011.	None	Agree.	
UK 3	Annex I, 13	The use of "may" in the final sentence is not correct according to ISO/CEN Directives.	Final sentence to read "This **can** lead to temporary non-compliance with . . . ."	Correct! Tables H.3 and H.4 of ISO/IEC Directives – Part 2 distinguish clearly between permission ("may") and possibility and capacity ("can").	

UK 4	General	The editorial suggestions of the CEN consultant are fully supported.			
UK 5	General	This standard will replace EN 1975. It represents an incremental change only and existing type approvals based on it should be allowed to run until their expiry (for both versions of EN 1975 referenced).		Supported.	

Decision of the STD's WG:	Accepted Refused Postponed	Comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
				Until further notice	

Dispatched by CEN on 25.2.2011

FprEN 14894rev WI 286121	**LPG equipment and accessories – Cylinder and drum marking**	**Where to refer in RID/ADR: Acceptance as normative reference in design standards**	**Applicable sub-sections and paragraphs**: **6.2.3.9**

Assessed by CEN consultant on 27.1.2011

Summary of conclusions:

The text of this standard conforms to the provisions of RID/ADR as valid from 1.1.2011. It can be approved.

*Most of the suggested amendments proposed by the Working Group on Standards with the Joint Meeting as well as those in my assessment of the first UAP draft have been addressed adequately. A few improvements are recommended prior to publication – see **Annex** to this assessment, using the CEN electronic balloting commenting template.*

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as a normative reference in design and construction standards for LPG pressure receptacles.

Comments from members of the Joint Meeting:

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards

Decision of the STD's WG:	Accepted Refused Postponed	Comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
				Until further notice	

C.Published Standards

Dispatched by CEN on .14.12.2010 [English only]

EN ISO 13340:2001 WI 023 017	**Transportable gas cylinders – Cylinder valves for non-refillable cylinders – Specification and prototype testing**	**Where to refer in RID/ADR/ADN: 6.2.4.1**	**Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.3**

Assessed by CEN consultant on 12.12.2010

Summary of conclusions:

Generally, EN ISO 13340:2001 complies with the relevant provisions of RID/ADR 2011. Some critics in the assessment of the enquiry draft have been addressed. Some improvements for full coverage of RID/ADR provisions and additional improvements would be possible.

With respect to the normative reference EN 720-2 it couldn't be seen whether there is a possible non-compliance with the requirements in RID/ADR 2.2.2.1.5 which refers to ISO 10156:1996.

It is proposed that a revision under the Unique Acceptance Procedures is launched in order to improve the standard as necessary and as described in this assessment.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as a candidate for reference in RID/ADR, section 6.2.4.1, Table, under "for closures".

Comments from members of the Joint Meeting:

Country	Clause No.	**Comment (justification for change)**	**Proposed change**	Comment from CEN Consultant	Comment from WG Standards
UK 1	Whole standard	The UN adopted ISO 13340:2001 because the ISO standard for non refillable gas cylinders (ISO 11118:1999) has minimal specifications covering the valve. Its adoption was therefore necessary to raise the safety level of UN non refillable gas cylinders. On the other hand this standard is a normative reference in EN 12205:2001 'Transportable gas cylinders – Non refillable metallic gas cylinders' which is referenced in 6.2.4.1 and its status for RID/ADR cylinders is unaffected by the UN adopting ISO 13340. The decision of the Standards WG in 1998 remains valid. The change agreed for 6.2.3.6.1 in 2013 means that valves for non refillable cylinders must be conformity assessed with the gas cylinder, and this is provided for in EN 12205 and EN ISO 13340. Leaving the valve standard as a supporting nominative reference ensures that the two are linked.	Adopt ISO 13340:2001 in 6.2.2.3, but no changes to be made in 6.2.4.1. ISO 11118 is currently being revised under the Vienna Agreement and upon adoption will replace EN 12205. ISO should consider recommending removing ISO 13340 from 6.2.2.3 when ISO 11118 is revised to include ISO 13340 as a normative reference. Also, ISO 13340 should be revised. The adoption of European amendments by UAP is not supported since this undermines the objective of multi-modal harmonisation.	Subject to discussion by STDs WG.	

UK 2	General	Since this standard is not under revision, no detailed comments will be made.			
Decision of the STD's WG:	**Accepted** **Refused** **Postponed**	**Comments**	**Proposed transition regulation**	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
				Until further notice	