Economic Commission for Europe

INF.38rev

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 Geneva, 13 – 23 September 2011 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.1/2011/37, 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 the compliance of draft standards at enquiry and formal vote stage with regulations of RID/ADR/ADN.
- Since the last session of September 2010, six dispatches of eighteen draft standards and assessments by the CEN consultant were made available on the dedicated CEN webpage. All standards have been dispatched in time (8 weeks before the meeting of the Working Group on Standards) as agreed in the revised cooperation procedures between Joint Meeting and CEN (TRANS-WP15-AC1-100a3e).
 - Dispatch 4 and 5 include draft standards in addition to those which are included in ECE/TRANS/WP.15/AC.1/2011/37. Deadlines for comments were set at various dates, 6 September as the latest.
 - All comments received had been consolidated in document INF.38.
- 3. The outcome of the discussion of these comments by the Working Group on Standards (Std's WG) has been added in this revision of INF.38. It needs to be considered by the relevant standardizing bodies for the further preparation of the standards as a condition 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.51**).

A. Standards at Stage 2: Submitted for Public Enquiry

EN ISO 11120:1999	Gas cylinders - Refillable seamless steel tubes for	Where to refer in	Applicable sub-sections and paragraphs:
+prA1	compressed gas transport, of water capacity between	RID/ADR:	6.2.3.1 and 6.2.3.4
WI 023163	150 l and 3000 l - Design construction and testing -	6.2.4.1	
	Amendment 1: Requirements for design of tubes for		
	embrittling gases (EN ISO11120:1999/DAM 1:2011)		

ISO text and European Annex dispatched on 23 June 2011 (Dispatch 2) and again on 19 July 2001 (Dispatch 4).

Assessment of prEN ISO 11120:2000, dated 3 January 2011 dispatched on 23 June 2011 (Dispatch 2). Assessment of draft amendment, dated 16 August 2011 (Dispatch 6).

Summary of conclusions for amendment:

EN ISO 22435:2007 + prA1 ((mistake; should read EN ISO11120:1999 + prA1)) is compliant with RID/ADR and can be approved. No editorial improvement is considered necessary.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as a replacement of the existing reference to EN ISO 11120:1999 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 WG Standards
UK 1		This simple amendment clarifies the existing text concerning the stress calculation for service with gases liable to induce hydrogen embrittlement shall be based on guaranteed properties, not on actual properties.		Considered to be an explanation.
UK 2		The assessment included with dispatch 2 is not relevant for this amendment. Comment CEN Consultant: Correct. Assessment of amendment is part of Dispatch 6.		See Consultants comment in column 3.
UK 3		Amendment should be accepted for reference in RID/ADR.		Supported.
UK 4	European Annex	This is the European Annex to the standard reviewed above in Dispatch 2. It is also satisfactory.		Supported together with general comment in last line.
CH 1		prA1 is o.k. It is not clear what the assessment of the CENconsultant is for (EN ISO 11120:2010?) Comment CEN Consultant: See comment on UK 2.		See Consultants comment on UK 2 in column 3.

General comment by the Group: It is expected that a new revision of EN ISO 11120 will be published during 2012. If this is the case the above amendment will no longer be candidate for reference in RID/ADR.

prEN 16249	Tanks for the transport of dangerous goods - Service		Applicable sub-sections and paragraphs:
WI 296058	equipment - Cap for the adaptor for bottom loading	RID/ADR:	6.8.2.2 and 6.8.2.4.1
	and unloading	6.8.2.6	

Dispatched on 30 June 2011 (Dispatch 3)

Assessed by CEN consultant on 14 July 2011 (Dispatch 6).

Summary of conclusions:

FprEN 16119 isn't recommended to be approved. Several improvements are recommended.

A reference in RID/ADR is questioned based on the compulsory nature of the reference and alternative technical solutions in place.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG to decide on a reference in RID/ADR, subsection 6.8.2.6.1 with subsection 6.8.2.2 and 6.8.2.4.1 as applicable requirements.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards
UK 1		Agree with the CEN Consultant's assessment.		
CH 1		Should not be mentioned in RID/ADR/ADN		Supported; the standard shall not be referenced in RID/ADR.
CH 2		Comment CEN Consultant for version 2010-06, dispatched version 2011-02. Comment CEN Consultant: Assessment is based on text of version 2011-02.		No comment.
D 1		According to the standard the dimension of the cap shall be in accordance with 5.5 of EN 13315:2002 (Gravity discharge coupler). Because of this fixed dimension of the cap not all LGBF tank types of class 3 with their bottom loading and unloading equipment are covered. There can be other dimensions. The standard should not be referenced in ADR because of the obligatory function of all LGBF tank types for class 3 in ADR.		See comment on CH 1.
NI 1	6.2.1.3	Acceptance criteria The clause A 3.4 does not exist in EN 12266-1:2003. It is assumed that A4.3 was intended. To determine an acceptance criteria a leakage rate (Rate A) needs to be given for the table in A4.3.		To be addressed at CEN/TC level.

prEN 16257	Tanks for the transport of dangerous goods - Service equipment - Footvalve sizes other than 100 mm dia	Where to refer in RID/ADR:	Applicable sub-sections and paragraphs: 6.8.2.2.1 and 6.8.2.2.2
WI 296054	(nom)	6.8.2.6	0.0.2.2.1 and 0.0.2.2.2

Dispatched on 30 June2011

Assessed by CEN consultant on 9 August 2011 (Dispatch 6).

Summary of conclusions:

prEN 16257 is considered compliant with ADR and can be promoted to the formal vote stage.

Editorial amendments need to be considered for the preparation of the FV text.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as a candidate for reference in ADR subsection 6.8.2.6.1 and related to the requirements of paragraphs 6.8.2.2.1 and 6.8.2.2.2.

Comments from members of the Joint Meeting:

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards
UK 1		No objection to referencing this standard in ADR, provided the CEN Consultant's assessment is positive.		To be decided at FV stage. Consultant's assessment, issued on 9 August 2011, doesn't favour a reference.
CH 1		Agree with the comments of the CEN consultant except that mentioning of the standards EN 12266-1:2003 and EN 12266-2:2003 should remain.		See above. The Group confirms that the Consultant is right, as these standards are not used in the standard.
CH2	Annex A, table A1	As this annex is normative the values for often used DN 65 as shown in Table F1 (informative) should also be given.		For consideration at CEN/TC level.
CH 3	Table A.1, B.1	Each table should be placed as a whole on one page.		Considered to be an editorial improvement.
Nl 1	General	We would have preferred that EN 13308 and EN13316 would have been amended to suit different dimensions instead of one new standard (prEN16257) covering other dimensions in both types of footvalves.		To be considered for the further evolution of the mentioned standards.

EN ISO 22435:2007 +prA1	Gas cylinders — Cylinder valves with integrated pressure regulators — Specification and type testing	Where to refer in RID/ADR:	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4
WI 023169		6.2.4.1	

ISO text and European Annex dispatched on 30 June 2011 (Dispatch 3).

Assessed by CEN consultant on 12 August 2011 (Dispatch 6).

Summary of conclusions:

EN ISO 22435:2007 + prA1 is compliant with RID/ADR and can be approved. No editorial improvement is considered necessary. Proposed follow-up action:

No action, for the time being, as there is no intention to submit this standard as a candidate for reference in RID/ADR.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards
UK 1		The standard which this proposal amends refers to		The Group confirms that this standard is no candidate
		cylinder valves with built-in pressure regulators; it has		for reference in RID/ADR.
		a normative reference to EN ISO 10297 (which is ref-		
		erenced in RID/ADR for the type testing of the clo-		
		sure). The standard is concerned with the pressure		
		regulator only and therefore is not relevant to the re-		
		quirements of Chapter 6.2 of RID/ADR. Similarly, the		
		test described in this amendment is not linked to re-		
		quirements in RID/ADR and so this amendment does		
		not convert the standard into one that should be refer-		
		enced in RID/ADR. Furthermore, the UK is opposed		
		to this test on technical grounds since it does not repre-		
		sent the service conditions of the valve.		
CH 1		EN 22435:2007 is not mentioned in RID/ADR and not		No longer relevant, following the conclusion on
		available to the members of the joint meeting. A com-		UK 1.
		ment to the changes in prA1 is therefore not possible.		
		Comment CEN Consultant:		
		Correct.		
D 1		The standard (EN) ISO 22435 is not proposed to be		See comment on UK 1.
		referenced in the UN Orange Book and/or ADR/RID		
		by the responsible standardization committee		
		(ISO/TC58/SC2). The standard deals with cylinder		
		valves with integrated pressure regulators for industrial		
		gases. For cylinders valves EN ISO 10297 as manda-		
		tory applicable standard for closures for industrial		
		gases is already referenced in ADR/RID. According to		
		the decision of the Joint Meeting during its March		
		2011 meeting (see clause V.B of the minutes) all cyl-		
		inder valve have to meet EN ISO 10297. Additional		
		elements like e.g. pressure regulators and residual		
		pressure devices that do not carry out the closing func-		
		tion should not be assessed for its functionality which		
		might fall under other directives/regulations. The ma-		
		jor part of EN ISO 22435 deals with requirements for		

the pressure regulator part. All cylinder valves related requirements are overwritten by EN ISO 10297. There-	
fore it was already decided to replace these requirements by a simple reference to EN ISO 10297 in the completely revised standard which is currently under work.	

	N 14427	LPG equipment and accessories - Transportable re- fillable composite cylinders for LPG - Design and	Where to refer in RID/ADR:	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4					
W12	286120	construction	6.2.4.1						
Dispatche	Dispatched on 30 June 2011 (Dispatch 3).								
Assessme	ent of CEN co	onsultant pending.							
Commen	ts from men	nbers of the Joint Meeting:							
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards					
UK 1		In this revision the title has lost the phrase 'fully wrapped' but the scope is limited to fully wrapped cylinders. Suggest retaining previous title.		Supported to distinguish from other standards on hoop wrapped composite cylinders, as an example.					
UK 2		No objection to referencing this standard in RID/ADR, provided the CEN Consultant's detailed assessment is positive.		The Group supports the reference in RID/ADR.					
CH 1		Basically o.k. but there are some remarks		See above and below.					
CH 2	Scope	The standard is for cylinders for temperatures down to -40 C. But all the tests are only at -20 C. Is this reasonable?		Seen as a valid comment to be considered at CEN/TC level.					
CH 3	5.2.1.1.1	a) ASTM D 229-08 should reed 2290-08		Editorial comment to be considered at CEN/TC level.					
CH 4	5.2.13	After a) the service valve; should stay or		Editorial comment to be considered at CEN/TC level.					

	N 13776 286137	LPG equipment and accessories — Filling and dis- charge procedures for LPG road tankers	Where to refer in ADR: Reference in 4.3.3 questioned	Applicable sub-sections and paragraphs: 4.2.3 and 4.3.3			
Dispatch	Dispatched on 30 June 2011 (Dispatch 3).						
Assessme	Assessment of CEN consultant pending.						
Commer	Comments from members of the Joint Meeting:						
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from			

		WG Standards
UK 1	It is noted that the previous version of this standard is not referenced in the ADR and although a useful code of practice for safe operation of an LPG tanker, it does not address the specific requirements of Chapter 4.3 and therefore should not be referenced in the ADR. We await the assessment of the CEN Consultant.	The Group agrees that this standard shall not be referenced in ADR. It confirms the opinion of the Consultant as expressed in his assessment dated 15 September 2011 that the clauses the filling degree shall be fully aligned with the relevant ADR provisions.
CH 1	No CEN comments	It was the general feeling that the practicability and
CH 2	Should not be referenced in RID/ADR	completeness for the user of the standard requires
D 1	Standards about filling and discharge procedures should not be mentioned in RID/ADR. Operating procedures are not covered by RID/ADR.	improvement.

ISO text and European Annex dispatched on 19 July 2011 (Dispatch 4)

Assessed by CEN consultant on 18 August 2011 (Dispatch 6).

Summary of conclusions:

The text of this version of prEN ISO 11114-2 conforms to the provisions of ADR/RID. It can be promoted to the formal vote stage.

A few editorial improvements need to be considered for the drafting of the FV text.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as a candidate for replacement of the existing references in Subsections 4.1.4.1, P200 (10) and 6.2.2.2 of ADR/RID.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards	
UK 1		This standard is referenced only in the parts of the RID/ADR that originate at the UN. The standard will be submitted to the UN when published. There is no conflict with the regulations. Some editorial corrections are necessary.		The Group will await the outcome of the intended amendment of the existing reference in the UN Model Regulations and its harmonization with RID/ADR.	
CH 1		Comments of CEN Consultant are supported		To be considered at ISO and CEN/TC level (under the Vienna agreement).	

B. Standards at Stage 3: Submitted for Formal vote

EN 12245:2009+AC EN 12245:2009 +FprA1	Transportable gas cylinders – Fully wrapped composite cylinders	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 023154			

Corrigendum dispatched on 19 July 2011 (Dispatch 4); Draft amendment dispatched on 19 July 2011 (Dispatch 4).

Assessed by CEN consultant on 10.3.2011 (Dispatch 3 for March 2011 session)

Summary of conclusions:

This resubmitted amendment, together with the Corrigendum AC 2010 considers the comments put forward by the Joint Meeting Working Group on Standards and those of my assessment of the first final draft adequately. It can be approved.

A few editorial deficiencies should be removed by the editors prior to publication.

Proposed follow-up action:

This amendment needs to be discussed by the STDs WG as a replacement of the existing reference in RID/ADR, subsection 6.2.4.1 (EN 12245:2002) for the design and construction of non- UN pressure receptacles together with the Corrigendum EN 12245:2009+AC.

Country	Clause No.	C	omment (justification for change)	Proposed change	Comment from WG Standards		
UK 1	Corrigen- dum	This additio 12245 is sat	n of an informative note to clause 7 of EN isfactory.		Corrigendum follows an earlier requirement of the WG and is accepted.		
UK 2	FprA1		ment corrects errors and omissions in the n. It is satisfactory.		The amendment is supp	orted.	
CH 1	5.2.12	be fitted wit ing disc. Is t	or cylinders for the fire resistance test shall h either a pressure relief device or a burst- his required also for cylinders which are to be used with such devices? See also		Clause has been clarifie the existing text.	d with no consequences for	
CH 2	7	As the type approval of the old standard (2002) may be used for another 10 years it should be compulsory to mark the cylinder standard with its year of implementation (EN1245:2009). The addition of the year of number as part of the marking would be a general point to Not supported in context with the cylinder standard with its year of implementation (EN1245:2009).		at to be moved to the UN level. It with the initial stamping of the approval shall be available			
Decision of the STD's WG:		Accepted Additional comments: The title of the standard should be reconsidered to include "design, construction		Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals	
			and inspection" to be specific to the con-	EN 12245:2002	Before 1 January 2015		

 ections and paragraphs:

Until further notice

EN 1440:2008 +FprA1:2011 LPG equipment and accessories – Periodic inspection of transportable refillable LPG cylinders

years) is proposed.

dards.

Where to refer in RID/ADR: 4.1.4.1 P200(12), 2.5 and 6.2.4.2

12245:2009+A1:2011

Dispatched on 11 May 2011 (Dispatch 1). Re-edited draft dispatched on 21 August 2011 (Dispatch 5).

tents and in line with comparable stan-

According to the nature of the amendments and unchanged RID/ADR provisions the normal transition period (10

Assessment of first final draft by CEN consultant on 7. April 2011 (Dispatch 1). Summary of conclusions:

Comments by the Standards Working Group on the enquiry text of prEN 1440:2005 rev and of my assessment of prEN 1440:2007 rev have been addressed to some extent. Main non-compliances for a reference of this standard in RID/ADR have been removed by the amendment.

EN

However, some elements such as protected cylinders and "cylinder populations not covered by ADR" are still not compliant with the regulations of RID/ADR and will need to be exempt in the reference. The clauses on aluminium cylinders with an inspection interval of 10 years appear to be an additional element which fail to comply with the conditions of RID/ADR.

The new structure of the standard, which is proposed to be improved further should allow for a reference with the exemption of several Annexes. It is proposed that the standard is referenced in RID/ADR subsection 6.2.4.2 and in subsection 4.1.4.1, P200(11).

The approval of the amendment is supported, however under consideration of the proposed amendments outlined in the Annex to this assessment.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG for reference in RID/ADR subsection 6.2.4.2 as obligatory complement to the requirements of subsections 6.2.1.6 and 6.2.3.5 on the periodic inspection and test of non-UN pressure receptacles and – in addition – in subsection 4.1.4.1, P200(11).

Assessment of re- edited draft by CEN Consultant on 22 August 2011 (Dispatch 6)

Summary of conclusions:

The editorial comments in my earlier assessment on the first final draft of EN 1440/FprA1, dated 2011-02 wave not been considered in the second final draft from September 2011, except one (comment No. 6) which is deemed the most important: the inclusion of new table in clause 5.1 correlating all types of cylinders subject to the scope of the standard with test procedures.

My other comments need still to be considered for the preparation prior to publication or as a basis for a second UAP, or the full revision of the standard.

Despite these editorial deficiencies EN 1440 plus amendment is considered compliant with RID/ADR 2011 except for the protected cylinders and non-ADR- cylinders.

Proposed follow-up action:

EN 1440/FprA1 needs to be discussed by the STD's WG for reference in RID/ADR subsection 6.2.4.2 as obligatory complement to the requirements of subsections 6.2.1.6 and 6.2.3.5 on the periodic inspection and test of non-UN pressure receptacles.

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

UK 1	6.3.1.3 (5.2.3.1 in the "full draft")	The UK would like to see evidence that this ultrasonic thickness measurement in [only] one or more places provides equivalent safety to an internal visual inspection. Editorial: change 'minimal' to 'minimum'	Make this clause subject to competent authority approval.	It is understood that this comment relates to 5.2.3.1.3 which is also commented in CH 8. The Group agrees that clause 5.2.3.1.3 in the final text of the amendment shall be redrafted to require a test procedure agreed with the competent authority and which describes the measurement (e. g. using ultrasonic method) of a sufficient and specified number of measurements over the entire surface allowing a verification of the minimum wall thickness of the cylinder.
UK 2	6.4.2 and revised 7 (5.2.4.2 and 7.2 in the "full draft")	 What is meant by 'tightness of the valve'? gas tight, water tight, hand tight or torque applied to a specified value? Does the 'This' in the note refer to the tightness check or to the whole of the clause? 	Clarify the intention.	The Group agrees that the term "tightness" shall be amended to read "leak- tightness" to be specific. The text of the Note is agreed to read: "NOTE This leak- tightness check can"
UK 3	Comments of the CEN Consultant	1. The comments on aluminium cylinders are not correct. Special provision 'u' of P200 (10) is not applicable to LPG; it only applies to certain toxic gases (e.g. H ₂ S) whose normal minimum period is 5 years. 2. Otherwise, the comments are supported. Comment CEN Consultant: Correct.	Withdraw the advice on aluminium cylin- ders	The Consultant withdraws his comment. The UK comment becomes irrelevant.
CH 1		This is an amendment to EN 1440:2008 which itself has not been discussed yet by the Standard working group and which has not been made available to the members of the Joint meeting. Furthermore, in this amendment are so many modification of the standard EN 1440:2008 that it is impossible to use it in a proper way. Comment CEN Consultant: EN 1440:2005rev was discussed September 2007 – see INF. 51. ments on the text of the "full draft" distributed on 7 Sept	The standard as a whole should be rewritten and after that brought to the Standard working group.	This comment is addressed by the submission of the "full draft".

CH 2	of the CEN	In general we agree with the conclusions of the CEN consultant and comment 1 of UK. except some points mentioned afterwards:		See below.
CH 3		CEN comment to P200 (9): No action for this standard as (9) is only for substances not mentioned in the tables of P200		The WG agrees with no consequences for the text of the "full draft".
CH 4	Comments of the CEN Consultant	To comment 2 : The note is in 5.1		No longer relevant for the "full draft".
CH 5	Table 1	Note 3 To our opinion, the proof pressure test can only be replaced by a combination of acoustic pressure test and ultrasonic examination or an ultrasonic test for which an appropriate standard exists.	Note 3 to be amended or deleted.	Clarified; text shall be modified to comply with RID/ADR 6.2.1.6.1, Note 2.
CH 6	5.2.1.2.1	For cylinders with a 15 year period there should be a check of the compliance with the requirements of P200(12)	Amend f)	It was agreed that this Clause does not fully comply with the text of RID/ADR, 4.1.4.1, P200(12). It is suggested adding a Note which refers to this regulation and indicates its precedence over the text of the standard.
CH 7	5.2.2.2.4	d)	Amend: If the test pressure is exceeded the owner has to deliver the appropriate data to calculate the membrane stress.	The WG questions the practicability of this clause and its compliance with the method applied in practise.
CH 8	5.2.3.1.3	Check of minimal wall thickness. Only on place for measuring is not acceptable. There must be representative number of checks.	Amend	See comment on UK 1.
CH 9	7.4	The note refers to 5.4 which is no longer available		Cross reference to be corrected
CH 10	Annex B	It is not clear why there are different criteria for carbon steel cylinders in accordance with EN 1442 and EN 14140. In EN 14140 is no procedure described to define rejection criteria at the periodic inspection.	Delete B.2	The lack of rejection criteria for carbon steel cylinders in EN 14140 is seen as a gap which should be filled during the next revision of the standard. The same criteria as in EN 14638-3 may be used in this respect or be used as an example for detailed criteria in Annex B. This gap doesn't justify a refusal of a reference of this standard in RID/ADR as it isn't seen as a non-compliance.

CH 11	Annex D	In EN 14427 is no procedure described to define rejection criteria at the periodic inspection as mentioned in D.1.1	??	Agreed. This reference to EN 14427 should be deleted. It is suggested to require that the rejection criteria are agreed with the competent authority in context with the design type approval.
CH 12	Annex E	Annex E should be informative as for these cylinders (according to 1.6.2.10) the rules of competent authority of the country of carriage should be applied	Annex E to be excluded from RID/ADR. Additionally the note of Annex I should be integrated	It was agreed that this Annex shall be informative to keep the decision of the competent authority untouched. It was further agreed that a Note should be added similar to the one found at the end of Annex I (see also comment on CH 16).
CH 13	Annex F	The interval of the periodic inspection of composite cylinders is determined by the competent authority (P200(9)) and therefore also the procedure to extend an interval.	Annex F to be excluded from	It was agreed that this Annex shall be informative to keep the decision of the competent authority untouched. The text of e) should be replaced by the text found under E.3.
CH 14	Annex F	As for better practicability e) should be amended by the conditions of E3	Amend e) with text from E3	Considered and supported as an editorial improvement.
CH 15	Annex G+H	Not part of RID/ADR	Annex H+G to be excluded from RID/ADR	Agreed. Will need to be considered in the reference text in RID/ADR 6.2.4.2.
CH 16	Annex I	Annex I should be informative as the only relevant text is described in P200 of RID/ADR.	Annex I to be excluded from RID/ADR	It was agreed that this Annex shall be informative. The WG confirms that the text of this Annex is an incomplete copy of RID/ADR P200(12) and is at risk to become non- compliant with any change in the regulations. A note is asked to be added indicating that the application of this Annex is subject to the agreement by the competent authority.
CH 17	Annex J	Annex J should be informative as for these cylinders (according to 6.2.3.5.1) the rules of competent authority which has approved the cylinder should be applied. The title of Annex J should be amended with "Butane". Is it correct, to use for the test another flammable gas	Annex J to be excluded from RID/ADR.	It was agreed that this Annex shall be informative to keep the decision of the competent authority untouched. It was further agreed that a Note should be added to indicate that this Annex is mirroring the provisions of RID/ADR 6.2.3.5.1 and that these provisions take precedence over this Annex. Supported. Not answered, with no consequences for the adoption
		than the one already in the cylinder?		of the standard. To be considered for the drafting of

					the text to be published.	
WG	Scope		Velded steel LPG cylinders without speci-	Replace by:	Additional comment by the Group to improve com-	
STD's			m wall thickness (see" is not acceptable.		pliance with RID/ADR and to be considered for the	
					editing of the final text.	
		_	s the wall thickness will be specified in the	alternative design and		
		type approval.		construction (see EN		
				14140:2003+A1 or the		
				equivalent standard);"		
WG	5.2.2.2.1		kerosene" as included as an alternative to		Additional comment by the Group.	
STD's		The second secon	as to be compliant with the term "hydrau-			
		lic".				
Decision of the STD's WG:			EN 1440:2008+A1:2012 has been accepted The reference text shall exempt A	cated in column 5 above the following conditions shall be met: een accepted for reference in RID/ADR 2013 as follows: ll exempt Annexes G and H from application. be published as a full document similar to the "full draft" document provided to the mem- G.		

EN 13082:2008 +FprA1	Tanks for transport of dangerous goods — Service equipment for tanks — Vapour transfer valve	Where to refer in RID/ADR:	Applicable sub-sections and paragraphs: 6.8.2.2 and 6.8.2.4.1
WI 296062		6.8.2.6.1	

Dispatched on 11 May 2011 (Dispatch 1).

Assessed by CEN consultant on 11.4.2011 (Dispatch 1)

Summary of conclusions:

EN 13082:2008+FprA1 can be approved. It is considered compliant with the applicable regulations of ADR on the design and initial testing of service equipment of "tanks intended for the carriage of liquid petroleum products and other dangerous substances of Class 3 which have a vapour pressure not exceeding 110 kPa at 50 °C and petrol, and which have no toxic or corrosive subsidiary hazard".

No proposals for improvement are added to the assessment.

Proposed follow-up action:

This amendment needs to be discussed by the Std's WG together with EN 13082:2008 as a candidate for reference in ADR in addition to EN 13082:2001 indicating subsections 6.8.2.2 and 6.8.2.4.1 as applicable regulations and with a transition regulation for design types issued based on the 2001 issue of the standard.

Country	Country Clause No. Comment (justification for change)		Proposed change	Comment from WG Standards		
CH 1	CH 1 No objection to amendment A1			Supported. Amendment accepted.		
Decision of the STD's WG:		Accepted	Additional comments: The amendment is considered to fill a gap	Proposed transition regulation	Applicable for new type approvals or for	Latest date for withdrawal of existing type approvals

	in the existing standard with respect to a		renewals	
	technical requirement on tank service equipment. A shortened transition regulation is seen as necessary.	EN 13082:2001	Between 1 January 2005 and 30 June 2013	31 December 2014
It is noted that the RID/ADR regulations have and will be to be considered in addition to the standard.	EN 13082:2008+A1:	Until further notice		

ISO text dispatched on 23 June 2011 (Dispatch 2).

Assessed by CEN consultant on 18.6.2011 (Dispatch 2).

Summary of conclusions:

This standard describes a comprehensive safety concept for the design, construction, type testing and approval, initial testing and marking of bundles of cylinders. In difference, RID/ADR include only limited requirements on the subject (The same is true for the UN Model regulations). Some of the intentions of the standard will be impaired, therefore, such as the requirements on a design type approval and the marking of the bundle.

There is no contradiction of the RID/ADR requirements on bundles of pressure receptacles with the standard. Some of the packing provisions for certain gases could be reflected by additional information (Notes) in the standards.

In difference to other EN ISO design and construction standards European modifications are not required as European standards are already referenced in parallel with American standards and because the TPED Directives does not include additional marking requirements for bundles.

Some additional editorial deficiencies were detected and improvements suggested.

The standard can be approved.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as a replacement of the existing reference to EN 13769 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.

This discussion should be used to agree on a strategy on the implementation of the essential safety requirements in the UN Model regulations, RID/ADR and TPED as laid down in the standard. Furthermore, the text of RID/ADR 6.2.3.9 preliminary adopted for RID/ADR 2013 should be reconsidered again because it seems not suitable and not consistent with the rest of the RID/ADR requirement on bundles.

This assessment has been replaced by revision 2, dated 6 July 2011 with the following proposed action:

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as a replacement of the existing reference to EN 13769 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.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards
UK 1	ISO- Part	The CEN Consultant's suggestion for improvement		The Group agrees that the omissions indicated in the

	4.5	which states	ered in a general way by the clause 4.4, ; "Cylinders within a bundle shall be suit- intended gas service." The provision for		assessment should not hin nor should they be address	
		which ignor We do not f	0 litres) is a derogation so that a design ed it would still comply with RID/ADR. avour covering the restrictions on particu-			
			would create a very long list, e.g. compati- ydrogen, compatibility with alumin- etc.			
UK 2			a reference in RID/ADR agreed.		Supported.	
CH 1		be accepted Comment (EN version available!! It can therefore not for reference in RID/ADR. CEN Consultant: wever, the EN version doesn't include any h.		It was informed that for E European modifications of dispatched to the delegate cover sheet and the Europ pared by CCMC only after nal text of the ISO standar The standard was discussed ropean cover sheet and for	nly the ISO text will be s and that the European ean foreword will be prer the preparation of the fid has been provided.
CH 2		The conclusion of the CEN Consultant with respect to the acceptance of EN ISO 10961 is supported.			See final conclusion below.	
CH 3	5	In the EN ve	ersion, EN standards have to be used		well as EN standards are r	examples and that ISO as nentioned. European normative refer-
CH 4	2	ISO 13769 ((marking) is not applicable		The Group agreed that a E	European Annex is required
CH 5	6.3.4		ass has to be added as an compulsory op- irk (RID/ADR 2013, 6.2.3.9.7.2.2)		with common modification ments.	ns, following these com-
CH 6	6.3.4		marking for Acetylene is missing			
CH 7	6.3.3		the letter "H" has to be applied for hydrobility (RID/ADR 2013, 6.2.3.9.7.2.3)			
Decision STD's V		Accepted	Additional comments: -	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
				EN 13769:2003	Before 1 July 2007	
				EN 13769:2003 + A1:2005	Before 1 January 2015	
				EN ISO 10961:2012	Until further notice	

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

ISO text dispatched on 23 June 2011 (Dispatch 2) and again on 19 July 2011 (Dispatch 4) together with European Annex.

Assessed by CEN consultant on 9.6.2011 (Dispatch 2)

Summary of conclusions:

prEN ISO 11372 can be approved.

There is no need for European modifications. A few editorial amendments need to be considered prior to publication.

EN ISO 11372 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 12754:2001.in RID/ADR, 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 WG Standards
UK 1		Standard ac	cepted for reference in RID/ADR.		Supported.
UK 2		since the UN sentence "NOTE: The the requirement of the sequirement of	reference should be simply EN ISO 11372. The N text has no reference to ISO 11372. (The e EN version of this ISO standard fulfils ments and may also be used." is only used brence to an ISO standard is in adopted UN		Supported. It is important for the reference text that the EN ISO standard needs to be referenced as the UN Model Regulations don't refer to the ISO version.
CH 1		Comments of CEN Consultant are supported			Also supported.
Decision of the STD's WG:		Accepted	Additional comments: Shall replace the existing reference to I	EN 1801:1998, EN 1275	54:2001.in RID/ADR, subsection 4.1.4.1, P200(11).

FprEN 15888 WI 023164 Transportable gas cylinders - Cylinder bundles - Periodic inspection and testing	Where to refer in RID/ADR/ADN: 6.2.4.2	Applicable sub-sections and paragraphs: 6.2.1.6 and 6.2.3.5
--	--	---

Dispatched on 30 June 2011 (Dispatch 3).

Assessed by CEN Consultant on 10 July 2011 (Dispatch 6).

Summary of conclusions:

prEN 15888:2011 can be approved.

A few editorial deficiencies need to be removed prior to publication.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG for reference in RID/ADR subsection 6.2.4.2 and related to the requirements of subsections 6.2.1.6 and 6.2.3.5 on the periodic inspection and test of non-UN pressure receptacles.

Comme	Comments from members of the Joint Meeting:						
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards			
UK 1		The Bibliography needs editorial correction: the first reference concerns the Use of Work Equipment Directive and ADR and RID should be given their correct titles. Also, the Introduction has 'Use of Work Directive' instead of 'Use of Work Equipment Directive'.		To be considered for the final editing of the Standard.			
UK 2		Adoption as a reference in RID/ADR agreed.		Supported.			
CH 1		Comments of CEN Consultant: Normative references: the comment to No. 4 is not understood.		Clarified with no consequences for the reference.			
		Comment CEN Consultant: Comment on No. 4 (EN 13769:2003) reads: No. 4 has been assessed and found compliant with RID/ADR 2011/2013 and is scheduled to be discussed by the Standards Working Group in September 2011 as a candidate for reference in RID/ADR. This text is a mistake and should read: No. 4 has been adopted by the Standards Working Group as a normative reference in design and construction standards for non- UN pressure receptacles.					
CH 2	5.6	EN 13769 seems to be correct (not 10961)		The Group became aware that EN 13769 is still used in various clauses which is decided to be replaced by EN 10961. This need to be considered for the editing of the text.			
CH 3	5.7 f)	For the leak test the same wording as in EN 13769/7.3.3 should be used: The completed bundle shall be tested for leaks at the filling pressure, using appropriate methods and acceptance criteria as defined by the user. This operation can be performed under the responsibility of the bundle manufacturer or in a filling centre during the first fill after assembly as a part of the "inspection at time of filling".		Not supported as the proposed text is related to the initial testing taking place normally with the manufacturer and not to the periodical inspection.			
CH 4	6	The marking of the periodic test has to be in accordance with RID/ADR 6.2.2.7.7. 99/36/EC has to be replaced by 2010/35/EU		The first part of the comment is supported with the consequence of adding a Note referring to the additional marking provisions for the periodic inspection of bundles as in RID/ADR 6.2.2.7.7. The quotation of this number should be avoided to keep the reference flexible.			

			The Group agrees further that the second paragraph of Clause 6 is not related to the periodic inspection and not covered by its scope. However this issue (requalification is fully regulated by the EU Directive 2010/35/EU. Para to be deleted
Decision of the STD's WG:	Accepted	Comments: -	

FprEN 417:2011 Non- refillable metallic gas cartridges for liquefied petroleum gases, with or without a valve, for use with portable appliances – Construction, inspection testing and marking	RID/ADR/ADN:	Applicable sub-sections and paragraphs: 6.2.6
--	--------------	---

Dispatched on 30 June 2011 (Dispatch 4).

Assessed by CEN Consultant on 27 June 2011(Dispatch 6)

Summary of conclusions:

FprEN 417 fully complies with the provisions of RID/ADR on the design, construction and testing of gas cartridges. It can be approved.

Some editorial improvements need to be considered prior to publication.

FprEN 417 shall replace EN 417:2003 in RID/ADR, subsection 6.2.6.4.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG for reference in RID/ADR 6.2.6.4 as replacement of EN 417:2003, and declared as to comply with the requirements of Section 6.2.6.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards
UK 1	4.1.2	For methylacetylene the limitation on copper should be 65%; see P200 table 2 UN 1060 and special provision P200 (10) c. This is a legal rather than a safety point – 70% is a safe level; 65% was adopted to harmonise with North American regulations.		The Group agrees with this comment, i.e., that it requires that the figure in EN 417 is aligned with the one in RID/ADR P200 (10) c. According to the judgment that the figure 70% isn't considered unsafe, this adaptation can be considered for the next revision of the standard and doesn't prohibit the agreement for the reference of EN 417:2011 in RID/ADR.
UK 2		Adoption as a reference in RID/ADR agreed.		See above.
CH 1		Comments of CEN Consultant are supported but we did not receive the F-version as mentioned in the comments. Comment CEN Consultant: The dispatched text is the FV- text which may differ		Consultants comments to be considered.

		from the pul	olished version after editing.	
CH 2			and testing has to be in accordance with .2.6 especially 6.2.6.1.5, 6.2.6.2, 6.2.6.3.	The Group agrees that it is difficult to relate the indicated RID/ADR design rules with the ones in EN 417. and that the wording could be improved to be further aligned with the RID/ADR requirements. However, this should be considered for the next revision of the standard and doesn't prohibit the agreement for the reference of EN 417:2011 in RID/ADR.
CH 3	8		ne marking must comply with the of .2.3.10/6.2.2.8.1	Withdrawn. The indicated marking provisions don't apply to non- refillable gas cartridges.
Decision STD's V		Accepted	Additional comments: -	

FprEN 13110	LPG equipment and accessories – Transportable refillable welded aluminium cylinders for liquefied	Where to refer in RID/ADR/ADN:	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4
WI 286112	petroleum gas – Design and construction	6.2.4.1	0.2.0.1

Enquiry draft text dispatched on 19 July 2011 (Dispatch 4).

Assessed (negatively) by CEN Consultant on 10 July 2011 (Dispatch 6)

Summary of conclusions:

The text of this standard doesn't comply with all of the provisions of RID/ADR 2011, including the preliminary amendments to become effective by 1.1.2013. It cannot be approved. The non-compliance was already noted by the STD's WG at its meeting in March 2010.

Some additional editorial issues need to be improved – see Annex to this assessment.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as a replacement of EN 13110:2002 in RID/ADR, subsection 6.2.4.1, Table, under "for design and construction" and indicating RID/ADR subsections 6.2.3.1 and 6.2.3.4 as applicable requirements.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards
UK 1		With the corrections suggested by the CEN Consultant, this standard could be adopted for reference in RID/ADR.		Discussion postponed in the absence of the FV text.
UK 2		We do not understand the CEN Consultant's final comment concerning sub clause 7.12. The text is identical to the text in prEN 13110 considered by the Standards Working Group in March 2010. Is this a repeat of the Consultant's request of March 2010 to insert 'visible' in 7.12.2.2?		
		Comment CEN Consultant:		

		UK 2 is base	ed on the text dispatched on 19 July 2011	
			old enquiry text. The FV- text has not	
		been dispate	hed, by error.	
		FprEN 1311 prEN 13110	0:2011-04 has not been received, only :2009-08.	
		1	CEN Consultant:	
Decision of the STD's WG:		Postponed	Additional comments: -	

FprEN 13799	LPG equipment and accessories – Contents gauges for LPG tanks	Where to refer in RID/ADR:	Applicable sub-sections and paragraphs: 6,2,3,5
WI 286113	Tot Li G taling	Not to be referenced	Vialitie .

Dispatched on 19 July 2011 (Dispatch 4).

Assessed by CEN Consultant on 27 July 2011 (Dispatch 6)

Summary of conclusions:

FprEN 13799 can be approved. A few improvements are repeatedly recommended.

The standard is not considered a candidate for reference in RID/ADR/ADN.

Proposed follow-up action:

No action required, as this standard is not related to RID/ADR/ADN-requirements.

Country	Clause No.	Comment (justification for change)		Proposed change	Comment from WG Standards
UK 1		dard is not re no reason to to ensure co	t the previous edition (2002) of this stan- eferenced in the RID/ADR and we can see reference this since, apart from the need mpatibility of the gauge with LPG, the es not address the requirements of		The Group agrees that is standard is no candidate for reference in RID/ADR.
CH 1		Only prEN 13799:2009-08 is available			
CH 2		Should not be referenced in RID/ADR			
Decision of the STD's WG:		Reference denied	Additional comments: -		

EN 12493+FprA1 WI 286133	LPG equipment and accessories – Welded steel tanks for liquefied petroleum gas (LPG) – Road tankers design and manufacture	Where to refer in ADR: 6.8.2.6.1	Applicable sub-sections and paragraphs: 6.8.2.1 (with the exception of 6.8.2.17), 6.8.3.1, and 6.8.5.1 – 6.8.5.3 as applicable
--------------------------	--	----------------------------------	--

Dispatched on 19 July 2011 (Dispatch 4).

Assessed by CEN Consultant on 26 July 2011 (Dispatch 6)

Summary of conclusions:

The alignment of the calculation method for the minimum wall thickness with RID/ADR was one of the comments of the STD's WG on FprEN 12493:2007 "to be considered for future amendments". This issue is still open.

As requested by the Joint Meeting, all normative references need to be checked for compliance with RID/ADR. The Amendment has been used to catch on as this was not part of my earlier assessment. It proves that some normative references have the capacity to conflict with RID/ADR. It is proposed to check compliance in detail during the next revision process.

The new definition for LPG introduced by the Amendment shows a minor difference with the one adopted preliminary by the Joint Meeting for RID/ADR/ADN 2013. As this definition will be used in all relevant standards of CEN/TC 286 a harmonisation or mutual tolerance should be sought.

With respect to the applicable parts of the standard and the applicable subsections and paragraphs of ADR the existing restrictions need to be kept. However, it is proposed to designate subsections 6.8.2.1 (with the exception of 6.8.2.17), 6.8.3.1, and 6.8.5.1 - 6.8.5.3 as applicable.

The Amendment is supported to be approved. The pending issues shall be addressed during the next revision.

Proposed follow-up action:

This amendment of EN 12493:2008 needs to be discussed by the STD's WG as a replacement of the exiting reference in ADR, subsection 6.8.2.6.1.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards
UK 1	3.9	In the definition of LPG, the text should be preceded by "a low pressure liquefied gas composed of" and at the end should read "with traces" rather than "or traces" as in the definition adopted by the Joint Meeting RID/ADR.		Supported. See also related detailed comment in the report to Plenary (Sep. 20011, INF. 51, 2.4.3).
UK 2	Table L.1, No.15	The cross reference should be to no. 14 and not no. 13. This amendment is satisfactory and does not affect the eligibility of the standard for referencing in RID/ADR.		Editorial comment to be considered at CEN/TC level.
CH 1		Agree with CEN consultant. As the promised changes are not executed the amendment should be rejected		These comments, supported by France and Germany need carefully be addressed for the next revision of
NI 1	General	For design and construction of tanks the standard EN 14025 should precede over this standard. EN 12493 should therefore be redrafted and only contain aspects which are of specific importance to LPG tankers. The new definition of LPG will limit the scope of the standard very clearly to only the products described in the definition and tanks for other hydro-carbon gases		the standard. EN 12493 could be replaced by an Annex to EN 14025 where all specific LPG- specific requirements could be included.

NI 2	2.1 amendment to clause 3.5	ported in tar constructed dedicated to equipment. This note ex tanks. De-m ers and this	the same properties will have to be trans- nks according to EN 14025. Gas tanks are for multi purpose transport and maybe o LPG distribution transport by different explains that LPG tankers can only be fixed accountable tanks are also used as LPG tank- is also allowed for distribution transport.		The Group confirm the The Note need to be del	correctness of this comment.
NI 3	5.2 amendment of note to 6.4	diameter less than 1.5 m. Stating only a diameter is not			missing unit in the Note supports the view that it compartments above sp- inspection body to enter don't include a waiver s	at is deemed to correct the (which accepted) the Group internal inspection of tanks and ecified volumes requires the the tank. The regulations subject to the agreement by the die Group favours an alignment atted in the comment.
NI 4	10 Amendment on Annex L	Information on tank plate. Item 8 "Area of operation" is rather vague and no additional value is seen while the minimum working temperature is already stated in item 7. Item 13 "Maximum Allowable Working Pressure". In Chapter 4.3 and 6.8 no working pressure is given for these gases only test pressures. Value to be introduced here leads to discussions and sometimes arguments between manufacturers and approval bodies. Besides this chapter 6.8 does not use this terminology. Although these items are not new they should be dealt with.			The Group feels that Ite and requires no amenda In difference, Item 13 is	m 8 is sufficiently explained ment. s superfluous and misleading. comment and asks that this
Decision STD's V		Accepted with conditions and re-	Additional comments: The Group was dissatisfied by the progress made by the amendment and would	Proposed transition regulation	Applicable for new type approvals	Latest date for withdrawal of existing type approvals
		strictions	have refused a reference if this would have been a new standard. Arguments which persuaded the Group to propose it	EN 12493:2008 (except Annex C)	Between 1 January 2010 and 31 Decem- ber 2012	31 December 2014

for reference were the existing references to this standard and the conclusion that an important, however limited improvement has been made (maximum compartment	EN 14493:2008+A1:2012 (except Annex C)	Until further notice	
size).	(applicable subsec-		
The Group welcomed and will relay on	tions and paragraphs		
the announcement of the LPG industry to	unchanged from the		
make any effort to align this standard with	line above)		
the design principles and design rules for			
road tank vehicles.			

Dispatched on 19 July 2011 (Dispatch 4).

Assessed (negatively) by CEN Consultant on 6 August 2011 (Dispatch 6)

Summary of conclusions:

This standard has repeatedly been assessed against earlier versions of ADR and been referenced in ADR as applicable for a limited number of ADR provisions. One negative comment of the Working Group on standards has been addressed in FprEN 12252:2011 with the expectation that the exemption of 6.8.3.2.3 in the reference could be removed.

A detailed comparison of all ADR provisions on the equipping of LPG tank vehicles, relevant to the scope of the standard reveals a significant number of non-conformances in the standard.

Extent and nature of these shortcomings would require a continued limitation of the range of ADR provisions which is declared applicable. Detailed warnings on those non- compliances would need to be added in case that the standards would be kept on this level.

This situation should not be continued for the sake of the user of this standard who would disregard many ADR provisions on the subject if he would follow this standard alone.

FprEN 12252:2011 is not supported to be approved. It is proposed that a new revision process is launched using the enquiry/formal vote route. This revision process should also address the detected non- compliances and a merger with EN 12493.

Proposed follow-up action:

This revised version of EN 12252 needs to be discussed by the STD's WG as a replacement of the exiting reference in ADR, subsection 6.8.2.6.1 (table) with 6.8.3.2 and 6.8.3.4.9 as applicable subsections and paragraphs.

However, the Working Group may support my view that all ADR requirements on the equipping of LPG tank vehicles should be addressed in the standard and be declared as applicable in the reference table.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards
CH 1		Support of CEN consultants view.		General support (see also D 1 and UK 1)
CH 2		There are several points which should be part of the		To be considered for the revision of the text.
		design standard and not of a standard for equipping		

		(e.g. 5.2.1 fastenings or 5.2.2.2 earth connection, and so on)	
D 1	6.1.3	Primary shut-off system: The arrangement and location of the discharge equipment is not clearly specified. The basic ADR requirement of at least three mutually independent closures is missing. That the non-return valve in 6.1.3.3. b (filling to vapour phase) must be an internal valve is also missing. 6.8.3.2.7 ADR is also not covered. Insofar the applicable subsection of ADR with the exception of 6.8.3.2.3 must be kept (and new exception of 6.8.3.2.7 ADR).	Supported.
NI 1	General	Standard is limited to LPG (see new definition), other hydro-carbon gases with the same properties cannot be transported in tanks equipped to this standard. Standard should be reconsidered and possibly merged with EN 12493 to give only specific LPG requirements for tanks additional to those in EN 14025.	Supported.
N1 2	3.2	Primary shut off system. The primary shut off system needs to close off the tank completely, not just sealing of flow. Original text was better.	Supported.
NI 3	3.10	Non return valve In the light of discussions concerning the use of a non return valve in the filling line to the vapour phase for use as the first closure of the tank, this non return valve shall be leak tight. Maybe there are two kind of non return valve but this is not reflected here.	To be considered for the revision of the text.
NI 4	6.1.3.5	Primary shut off system. In 6.1.3.4 hand operated and remote operated valves are possible. In 6.1.3.5 only the remote operated valves need to be in closed position when the road tanker is in motion. Independent of the way of operation they should be closed.	To be considered for the revision of the text.
UK 1		UK supports the comments and proposals of the CEN Consultant. Standard to be improved before adoption into the regulations.	See comment on CH 1.
Decision STD's V		Refused Additional comments: -	