

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 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.1/2011/37, 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.

2. 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.

3. This document is intended to inform about the comments received till 9 September 2011 and is intended to be discussed by the Working Group on Standards.

A. Standards at Stage 2: Submitted for Public Enquiry

EN ISO 11120:1999 +prA1	Gas cylinders - Refillable seamless steel tubes for compressed gas transport, of water capacity between 150 l and 3000 l - Design construction and testing - Amendment 1: Requirements for design of tubes for embrittling gases (EN ISO11120:1999/DAM 1:2011)	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 023163				
ISO text and European Annex dispatched on 23 June 2011 (Dispatch 2) and again on 19 July 2001 (Dispatch 4).				
<p>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).</p> <p>Summary of conclusions for amendment: <i>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.</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 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.</i></p>				
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.		
UK 2		<p>The assessment included with dispatch 2 is not relevant for this amendment.</p> <p>Comment CEN Consultant: Correct. Assessment of amendment is part of Dispatch 6.</p>		
UK 3		Amendment should be accepted for reference in RID/ADR.		
UK 4	European Annex	This is the European Annex to the standard reviewed above in Dispatch 2. It is also satisfactory.		
CH 1		<p>prA1 is o.k. It is not clear what the assessment of the CEN-consultant is for (EN ISO 11120:2010?)</p> <p>Comment CEN Consultant: See comment on UK 2.</p>		

prEN 16249	Tanks for the transport of dangerous goods - Service equipment - Cap for the adaptor for bottom loading and unloading		Where to refer in RID/ADR: 6.8.2.6	Applicable sub-sections and paragraphs: 6.8.2.2 and 6.8.2.4.1
WI 296058				
Dispatched on 30 June 2011 (Dispatch 3)				
Assessed by CEN consultant on 14 July 2011 (Dispatch 6). Summary of conclusions: <i>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.</i> Proposed follow-up action: <i>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.</i>				
Comments from members of the Joint Meeting:				
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		
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.		
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.		
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.		
prEN 16257	Tanks for the transport of dangerous goods - Service equipment - Footvalve sizes other than 100 mm dia (nom)		Where to refer in RID/ADR: 6.8.2.6	Applicable sub-sections and paragraphs: 6.8.2.2.1 and 6.8.2.2.2
WI 296054				

Dispatched on 30 June 2011				
Assessed by CEN consultant on 9 August 2011 (Dispatch 6). Summary of conclusions: <i>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.</i>				
Proposed follow-up action: <i>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.</i>				
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.		
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.		
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.		
CH 3	Table A.1, B.1	Each table should be placed as a whole on one page.		
NI 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.		

EN ISO 22435:2007 +prA1	Gas cylinders — Cylinder valves with integrated pressure regulators — Specification and type testing	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 023169				
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: <i>EN ISO 22435:2007 + prA1 is compliant with RID/ADR and can be approved. No editorial improvement is considered necessary.</i>				
Proposed follow-up action: <i>No action, for the time being, as there is no intention to submit this standard as a candidate for reference in RID/ADR.</i>				
Comments from members of the Joint Meeting:				
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards

UK 1		<p>The standard which this proposal amends refers to cylinder valves with built-in pressure regulators; it has a normative reference to EN ISO 10297 (which is referenced in RID/ADR for the type testing of the closure). The standard is concerned with the pressure regulator only and therefore is not relevant to the requirements of Chapter 6.2 of RID/ADR. Similarly, the test described in this amendment is not linked to requirements in RID/ADR and so this amendment does not convert the standard into one that should be referenced in RID/ADR. Furthermore, the UK is opposed to this test on technical grounds since it does not represent the service conditions of the valve.</p>		
CH 1		<p>EN 22435:2007 is not mentioned in RID/ADR and not available to the members of the joint meeting. A comment to the changes in prA1 is therefore not possible.</p> <p>Comment CEN Consultant: Correct.</p>		
D 1		<p>The standard (EN) ISO 22435 is not proposed to be 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 mandatory 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 cylinder 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 function should not be assessed for its functionality which might fall under other directives/regulations. The major part of EN ISO 22435 deals with requirements for the pressure regulator part. All cylinder valves related requirements are overwritten by EN ISO 10297. Therefore 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.</p>		

prEN 14427	LPG equipment and accessories - Transportable re-fillable composite cylinders for LPG - Design and construction		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 286120				
Dispatched on 30 June 2011 (Dispatch 3).				
Assessment of CEN consultant pending.				
Comments from members 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.		
UK 2		No objection to referencing this standard in RID/ADR, provided the CEN Consultant's detailed assessment is positive.		
CH 1		Basically o.k. but there are some remarks		
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?		
CH 3	5.2.1.1.1	a) ASTM D 229-08 should read 2290-08		
CH 4	5.2.13	After a) the service valve; should stay or		

prEN 13776	LPG equipment and accessories — Filling and discharge 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
WI 286137				
Dispatched on 30 June 2011 (Dispatch 3).				
Assessment of CEN consultant pending.				
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.		

CH 1		No CEN comments		
CH 2		Should not be referenced in RID/ADR		
D 1		Standards about filling and discharge procedures should not be mentioned in RID/ADR. Operating procedures are not covered by RID/ADR.		

prEN ISO 11114-2	Transportable gas cylinders – Compatibility of cylinder and valve materials with gas contents – Part 2: Non- metallic materials (ISO/DIS 11114-2:2011)	Where to refer in RID/ADR: 4.1.4.1, P200(10) and 6.2.2.2	Applicable sub-sections and paragraphs: 6.2.1.2
WI 023139			

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.

Comments from members of the Joint Meeting:

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.		
CH 1		Comments of CEN Consultant are supported		

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: <i>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.</i>					
Proposed follow-up action: <i>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.</i>					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards	
UK 1	Corrigen- dum	This addition of an informative note to clause 7 of EN 12245 is satisfactory.			
UK 2	FprA1	This amendment corrects errors and omissions in the 2009 version. It is satisfactory.			
CH 1	5.2.12	The valve for cylinders for the fire resistance test shall be fitted with either a pressure relief device or a bursting disc. Is these also for cylinders which are not intended to be used with such devices? See also 5.2.1.2 b)			
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).			
Decision of the STD's WG:	Accepted	Comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
	Refused Postponed			Until further notice	

EN 1440:2008 +FprA1:2011	LPG equipment and accessories – Periodic inspection of transportable refillable LPG cylinders		Where to refer in RID/ADR: 4.1.4.1 P200(12), 2.5 and 6.2.4.2	Applicable sub-sections and paragraphs: 6.2.1.6. and 6.2.3.5
WI 286135				
Dispatched on 11 May 2011 (Dispatch 1). Re- edited draft dispatched on 21 August 2011 (Dispatch 5).				
Assessment of first final draft by CEN consultant on 7. April 2011 (Dispatch 1). Summary of conclusions: <i>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. 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.</i> Proposed follow-up action: <i>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).</i>				
Assessment of re- edited draft by CEN Consultant on 22 August 2011 (Dispatch 6) Summary of conclusions: <i>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.</i> Proposed follow-up action: <i>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.</i>				
Comments from members of the Joint Meeting:				
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards
UK 1	6.3.1.3	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.	
UK 2	6.4.2 and	1. What is meant by ‘tightness of the valve’? gas tight, water tight, hand tight or torque applied to a specified	Clarify the intention.	

	revised 7	value? 2. Does the 'This' in the note refer to the tightness check or to the whole of the clause?		
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 cylinders	
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.	The standard as a whole should be rewritten and after that brought to the Standard working group.	
Decision of the STD's WG:	Accepted Refused Postponed	Comments		

EN 13082:2008 +FprA1	Tanks for transport of dangerous goods — Service equipment for tanks — Vapour transfer valve	Where to refer in RID/ADR: 6.8.2.6.1	Applicable sub-sections and paragraphs: 6.8.2.2 and 6.8.2.4.1
WI 296062			
Dispatched on 11 May 2011 (Dispatch 1).			
Assessed by CEN consultant on 11.4.2011 (Dispatch 1) Summary of conclusions: <i>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".</i> <i>No proposals for improvement are added to the assessment.</i> Proposed follow-up action: <i>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 stan-</i>			

dard.						
Comments from members of the Joint Meeting:						
Country	Clause No.	Comment (justification for change)		Proposed change	Comment from WG Standards	
CH 1		No objection to amendment A1				
Decision of the STD's WG:	Accepted	Comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals	
	Refused				Until further notice	
	Postponed					

FprEN ISO 10961	Gas cylinders - Cylinder bundles - Design, manufacture, testing and inspection	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 023168			

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.

Comments from members of the Joint Meeting:

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards
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UK 1	ISO- Part 4.5	The CEN Consultant's suggestion for improvement No.1 is covered in a general way by the clause 4.4, which states; "Cylinders within a bundle shall be suitable for the intended gas service." The provision for Fluorine (150 litres) is a derogation so that a design which ignored it would still comply with RID/ADR. We do not favour covering the restrictions on particular gases; it would create a very long list, e.g. compatibility with hydrogen, compatibility with aluminium/copper, etc.			
UK 2		Adoption as a reference in RID/ADR agreed.			
CH 1		There is no EN version available!! It can therefore not be accepted for reference in RID/ADR. Comment CEN Consultant: Correct. However, the EN version doesn't include any modification.			
CH 2		The conclusions of the CEN Consultant are supported.			
CH 3	5	In the EN version, EN standards have to be used			
CH 4	2	ISO 13769 (marking) is not applicable			
CH 5	6.3.4	The gross mass has to be added as an compulsory operational mark (RID/ADR 2013, 6.2.3.9.7.2.2)			
CH 6	6.3.4	Additional marking for Acetylene is missing			
CH 7	6.3.3	If applicable the letter "H" has to be applied for hydrogen compatibility (RID/ADR 2013, 6.2.3.9.7.2.3)			
Decision of the STD's WG:	Accepted	Comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
	Refused Postponed				
NOTE: So far, RID/ADR don't require a type approval for bundles.					

FprEN ISO 11372	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) p
WI 023157			
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: <i>prEN ISO 11372 can be approved. There is no need for European modifications. A few editorial amendments need to be considered prior to publication.</i>			

<p><i>EN ISO 11372 is candidate for reference in RID/ADR.</i></p> <p>Proposed follow-up action: <i>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).</i></p>				
Comments from members of the Joint Meeting:				
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards
UK 1		Standard accepted for reference in RID/ADR.		
UK 2		The style of reference should be simply EN ISO 11372 since the UN text has no reference to ISO 11372. (The sentence <i>"NOTE: The EN version of this ISO standard fulfils the requirements and may also be used."</i> is only used where a reference to an ISO standard is in adopted UN text.)		
CH 1		Comments of CEN Consultant are supported		
Decision of the STD's WG:		Accepted Refused Postponed	Comments	

FprEN 15888	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	
WI 023164				
<p>Dispatched on 30 June 2011 (Dispatch 3).</p> <p>Assessed by CEN Consultant on 10 July 2011 (Dispatch 6).</p> <p>Summary of conclusions: <i>prEN 15888:2011 can be approved.</i> <i>A few editorial deficiencies need to be removed prior to publication.</i></p> <p>Proposed follow-up action: <i>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.</i></p>				
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'.		

UK 2		Adoption as a reference in RID/ADR agreed.		
CH 1		<p>Comments of CEN Consultant: Normative references: the comment to No. 4 is not understood.</p> <p>Comment CEN Consultant: Comment on No. 4 (EN 13769:2003) reads: <i>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.</i></p> <p>This text is a mistake and should read: <i>No. 4 has been adopted by the Standards Working Group as a normative reference in design and construction standards for non-UN pressure receptacles.</i></p>		
CH 2	5.6	EN 13769 seems to be correct (not 10961)		
CH 3	5.7 f)	<p>For the leak test the same wording as in EN 13769/7.3.3 should be used:</p> <p><i>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".</i></p>		
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		
Decision of the STD's WG:	Accepted Refused Postponed	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	Where to refer in RID/ADR/ADN: 6.2.6.4	Applicable sub-sections and paragraphs: 6.2.6
WI 181051			
Dispatched on 30 June 2011 (Dispatch 4).			
Assessed by CEN Consultant on 27 June 2011(Dispatch 6) Summary of conclusions: <i>FprEN 417 fully complies with the provisions of RID/ADR on the design, construction and testing of gas cartridges. It can be approved.</i>			

*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.

Comments from members of the Joint Meeting:

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 legal rather than a safety point – 70% is a safe level; 65% was adopted to harmonise with North American regulations.		
UK 2		Adoption as a reference in RID/ADR agreed.		
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 from the published version after editing.		
CH 2		The design and testing has to be in accordance with RID/ADR 6.2.6 especially 6.2.6.1.5, 6.2.6.2, 6.2.6.3.		
CH 3	8	Marking: The marking must comply with the of RID/ADR 6.2.3.10/6.2.2.8.1		
Decision of the STD's WG:		Accepted Refused Postponed	Comments	

FprEN 13110	LPG equipment and accessories – Transportable refillable welded aluminium cylinders for liquefied petroleum gas – Design and construction	Where to refer in RID/ADR/ADN: 6.2.4.1	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4
WI 286112			
Enquiry draft text dispatched on 19 July 2011 (Dispatch 4).			
Assessed (negatively) by CEN Consultant on 10 July 2011 (Dispatch 6) Summary of conclusions: <i>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.</i>			

Proposed follow-up action: <i>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.</i>				
Comments from members of the Joint Meeting:				
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.		
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 based on the text dispatched on 19 July 2011 which is the old enquiry text. The FV- text has not been dispatched, by error.		
CH 1		FprEN 13110:2011-04 has not been received, only prEN 13110:2009-08. Comment CEN Consultant: Correct.		
Decision of the STD's WG:		Accepted Refused Postponed	Comments	

FprEN 13799	LPG equipment and accessories – Contents gauges for LPG tanks	Where to refer in RID/ADR: Not to be referenced	Applicable sub-sections and paragraphs: 6.2.3.5
WI 286113			
Dispatched on 19 July 2011 (Dispatch 4).			
Assessed by CEN Consultant on 27 July 2011 (Dispatch 6) Summary of conclusions: <i>FprEN 13799 can be approved. A few improvements are repeatedly recommended. The standard is not considered a candidate for reference in RID/ADR/ADN.</i> Proposed follow-up action: <i>No action required, as this standard is not related to RID/ADR/ADN-requirements.</i>			

Comments from members of the Joint Meeting:				
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards
UK 1		We note that the previous edition (2002) of this standard is not referenced in the RID/ADR and we can see no reason to reference this since, apart from the need to ensure compatibility of the gauge with LPG, the standard does not address the requirements of 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:		Accepted Refused Postponed	Comments	

EN 12493+FprA1	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
WI 286133			

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.

Comments from members of the Joint Meeting:				
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.		
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.		
CH 1		Agree with CEN consultant. As the promised changes are not executed the amendment should be rejected		
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 too only the products described in the definition and tanks for other hydro-carbon gases which have the same properties will have to be transported in tanks according to EN 14025. Gas tanks are constructed for multi purpose transport and maybe dedicated to LPG distribution transport by different equipment.		
NI 2	2.1 amendment to clause 3.5	This note explains that LPG tankers can only be fixed tanks. De-mountable tanks are also used as LPG tankers and this is also allowed for distribution transport. Although note is informative it will create discussion. => Delete new note.		
NI 3	5.2 amendment of note to 6.4	Note states that no manhole is needed for tanks with a diameter less than 1.5 m. Stating only a diameter is not sufficient also a limit should be given on the capacity of the tank. EN 14025 in 6.3.5.3.1 gives the volume of 3000 litre for upper threshold value for inspection openings.		
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.		
Decision of the STD's WG:	Accepted Refused Postponed	Comments		

FprEN 12252:2011	LPG equipment and accessories – Equipping of LPG road tankers	Where to refer in ADR: 6.8.2.6.1	Applicable sub-sections and paragraphs: 6.8.3.2 and 6.8.3.4.9
WI 286134			

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.

Comments from members of the Joint Meeting:

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from WG Standards
CH 1		Support of CEN consultants view.		
CH 2		There are several points which should be part of the 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 mu-		

		tually 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).		
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.		
NI 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.		
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 fase 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.		
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.		
UK 1		UK supports the comments and proposals of the CEN Consultant. Standard to be improved before adoption into the regulations.		
Decision of the STD's WG:		Accepted Refused Postponed	Comments	