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## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

##### Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Geneva, 17–21 September 2018

Item 3 of the provisional agenda

#### Standards

### Amendments to the standards concerning tanks

Transmitted by the Government of France\* \*\*

<b>Executive summary:</b>	Clarify the situation for the application of tank standards.
<b>Action to be taken:</b>	Coordinate the voluntary application of the most suitable standards.
<b>Reference documents:</b>	ECE/TRANS/WP.15/AC.1/150, para. 9 and annex II ECE/TRANS/WP.15/139, para. 25 ECE/TRANS/WP.15/142, annexes III and IV

1. At its March 2018 session, the Joint Meeting adopted the proposals of the working group on standards to add references to standards EN 12972:2018 and EN 14025:2018 in 6.8.2.6.1 and 6.8.2.6.2 of RID/ADR, provided that they were published before 1 June 2018.
2. Similarly, at its November 2017 session, the Working Party on the Transport of Dangerous Goods (WP.15) made clear that references to standards, including EN 13317:2018, would be deleted if the standards were not published in time.
3. Unfortunately, these three tank standards were not ready by 1 June 2018, despite a considerable effort to meet the deadlines on the part of the standardization groups responsible for revising them. As a result, the amendments concerning the standards were removed from the list of amendments announced for entry into force on 1 January 2019.

\* In accordance with the programme of work of the Inland Transport Committee for 2018–2019 (ECE/TRANS/2018/21/Add.1, cluster 9, (9.2)).

\*\* Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2018/29.



4. This regrettable situation will have consequences for the competent authorities, inspection bodies and tank manufacturers and poses major difficulties of application in the light of the changes to the regulations adopted in recent years.
5. For example, RID/ADR refers to the standard EN 12972:2007 in relation to the initial, intermediate and periodic inspection of tanks. Removing from the regulations the notion of maximum working pressure for gravity-discharge tanks, which represent almost 80% of road tankers, makes the provisions of this standard entirely unsuitable for hydraulic and leakproofness tests. Consequently, the mandatory standard currently referred to can no longer be used in these cases, which gives rise to real legal uncertainty.
6. As a further example, standard EN 12972:2018 specifies in detail the non-destructive tests (NDT) to be carried out on tanks' welds. A delay in the application of these provisions for improving the construction of tanks has quite a detrimental effect.
7. Moreover, the various users of RID/ADR have difficulty understanding why basic standards drawn up in 2017, reviewed by the working group on standards, adopted by the Joint Meeting in March 2018 and WP.15 in May 2018 and published in the summer of 2018 should become mandatory only in 2023 (if the usual procedure is followed).
8. These standards, published in the summer of 2018, even if they are not referred to in RID/ADR 2019, may be used in accordance with 6.8.2.7 of RID/ADR, which states that "a standard which has been adopted for reference in a future edition of the RID/ADR may be approved by the competent authority for use".
9. However, this could give rise to further confusion in the coming five-year period, during which two versions of each standard could be used, one of which does not entirely conform to the essential requirements of the regulations. Moreover, on certain points, standards EN 12972:2018 and EN 14025:2018 refer to each other. The overall coherence of the system would therefore be completely undermined.
10. In order for EN 12972:2018 to be consistently applied based on 6.8.2.7, it would be desirable for all competent authorities to undertake not only to endorse the use of the standard but also to encourage its use as of 1 July 2019 given that using its 2007 version could lead to regulatory inconsistencies. This could perhaps be made clear by guidelines published on the websites of OTIF and ECE.
11. References to the other standards should be adopted in amendments for entry into force on 1 January 2021, with a transitional period lasting only until 1 July 2021.
12. The Joint Meeting is invited to make a decision on the proposals contained in paragraphs 10 and 11.

## Annex

Draft amendments to RID/ADR adopted by the Joint Meeting and WP.15

6.8.2.6.1 Amend the table, under “*For design and construction of tanks*”, as follows:

- For standard “EN 14025:2013 + A1:2016”, in column (4), replace “Until further notice” with: “Between 1 January 2017 and 31 December 2020”.
- After the standard “EN 14025:2013 + A1:2016”, insert the following row:

EN 14025:2018	Tanks for the transport of dangerous goods — Metallic pressure tanks — Design and construction	6.8.2.1 and 6.8.3.1.	Until further notice	
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- After the new standard “EN 14025:2018”, insert the following row:

EN 12972:2018	Tanks for transport of dangerous goods — Testing, inspection and marking of metallic tanks	6.8.2.3	Mandatorily from 1 January 2021	
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(ADR only)

6.8.2.6.1 In the table, under “*For equipment*”, as follows:

- For standard “EN 13317:2002 + A1:2006”, in column (4), replace “Until further notice” by “Between 1 January 2009 and 31 December 2020”.
- After standard “EN 13317:2002 + A1:2006”, add the following new standard:

EN 13317:2018	Tanks for transport of dangerous goods — Service equipment for tanks — Manhole cover assembly	6.8.2.2 and 6.8.2.4.1	Until further notice	
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6.8.2.6.2 Amend the table as follows:

- For standard “EN 12972:2007”, in column (4), replace “Until further notice” with: “Until 30 June 2019”.
- After standard “EN 12972:2007”, insert the following row:

EN 12972:2018	Tanks for transport of dangerous goods — Testing, inspection and marking of metallic tanks	6.8.2.4 and 6.8.3.4	Mandatorily from 1 July 2019	
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(ADR only)

6.8.4 (d), TT11 In the paragraph after the table, replace “EN 14025:2013 + A1:2016” with: “EN 14025:2018”.