
Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

106th session

10 May 2019

Geneva, 13-17 May 2019

Item 6 (b) of the provisional agenda:

**Proposals for amendments to annexes A and B of ADR:
miscellaneous proposals**

Comments on 2019/11: Cross-sectional shapes of shells in accordance with ADR 6.8.2.1.18

Transmitted by the Government of France

1. France agrees with the recall of the discussions in WP.15 on the proposed footnote to 6.8.2.1.18 raised in document 2019/11 from Germany.
 2. However there seems to be a misunderstanding of the specific situation concerning the link between the proposed footnote and standard EN 13094 on design and construction of metallic gravity discharge tanks.
 3. During the long discussions in the Working Group on Tanks of the Joint Meeting on this subject, it was clearly agreed that localized deviations from convex curvature in general could be allowed in the regulation with the necessary inclusion of the detailed requirements in EN 13094 to provide safe construction.
 4. These conditions are necessary for the safe use of these tanks and if not included in the standard could have been part of RID/ADR. However, it has been agreed differently as the standard was about to be revised.
 5. That is why this text appears in square brackets. It is just to remind WP.15 that this adopted amendment also requires a modification of the standard to ensure the safety of such design.
 6. Given the progress made in revising EN 13094, this amendment will be most likely included in RID/ADR 2021.
-