

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods
(Seventy-ninth session, agenda item 4(a),
Geneva, 7-11 November 2005)

PROPOSALS OF AMENDMENTS TO ANNEXES A AND B OF ADR

Comments on TRANS/WP.15/AC.1/100/Add.2 – Texts adopted by the Joint Meeting

Transmitted by the European Industrial Gases Association (EIGA)

Introduction

EIGA would like to draw the attention of WP.15 to the fact that in, accordance with the recommendation of the Joint Meeting standards working group, page 15 of TRANS/WP.15/AC.1/100/Add.2 records that "EN 849:1996/A2:2001" shall be replaced by "EN ISO 10297:2006". There are tens of thousands of gas cylinders in circulation with valves bearing the mark EN 849 and these valves are still safe since this standard is technically the same as EN ISO 10297:2006. There is therefore a need to create a transitional provision to allow this existing equipment to be used.

The replacement of this standard is only the first of many future replacements of standards as the duplication between ISO and EN standards is eliminated and as standards evolve to take account of technical progress. The transitional measure therefore needs to be of a generalised kind that allows the continued use of all equipment made in accordance with withdrawn standards.

A parallel may be drawn between this situation of a withdrawn standard and the withdrawn technical code which is the subject of a new transitional provision listed on page 6 of TRANS/WP.15/AC.1/100/Add.2 :

"1.6.2.4 Pressure receptacles designed and constructed in accordance with technical codes no longer recognized according to 6.2.3 may still be used."

Proposal

EIGA therefore proposes the following transitional measure in respect of Chapter 6.2.

"1.6.2.5 Pressure receptacles and their closures designed and constructed in accordance with standards no longer listed in 6.2.2 or 6.2.5 may still be used."
