

**COMMITTEE OF EXPERTS ON THE TRANSPORT OF
DANGEROUS GOODS AND ON THE GLOBALLY
HARMONIZED SYSTEM OF CLASSIFICATION
AND LABELLING OF CHEMICALS**

Sub-Committee of Experts on the

Transport of Dangerous Goods

**(Twenty-first session, 1-10 July 2002,
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ADDITIONAL PROVISIONS FOR THE TRANSPORT OF GASES

Comments on St/SG/AC.10/C.3/2002/37 transmitted by the expert from Canada

Approval System for the Periodic Inspection and Tests of UN Certified Pressure Receptacles

Transmitted by the Expert from the United Kingdom

Background

1. The expert from the United Kingdom welcomes Paper ST/SG/AC.10/C.3/2002/37 submitted by Canada proposing provisions for the approval of periodic inspection and test bodies and the insertion of those provisions into the thirteenth edition of the Model Regulations.
2. The United Kingdom supports the need to include provisions for the approval of periodic inspection and test bodies into the Model Regulations, but has reservations over the procedure proposed by Paper 2002/37. The United Kingdom proposes to include the Canadian proposals but to modify them by incorporating them into the existing text of the Regulations, rather than produce new chapters/sections.
3. The current approvals regime for manufacturers and inspection bodies contained within Chapter 6.2.2.5 of the thirteenth edition, was drawn from the ISO Technical Report ISO/TC14600 and reworked by EIGA in Paper ST/SG/AC.10/2000/22. This was because there was a reluctance to adopt the ISO Technical Report into the Model Regulations due to it being a document in draft form which had not been published. The current provisions are an amalgamation of ISO/TC14600 requirements and decisions taken within the UN Gases Working Group at the 19th session.

Justification

4. The United Kingdom feels that it is unnecessary to introduce new sections into the Model Regulations dealing specifically with periodic inspection and testing bodies when much of the same principles apply to those bodies as apply to manufacturers and initial inspection bodies and which are already specified in the existing provisions.
5. As such, the United Kingdom feels that the Canadian proposals are best served by being incorporated into the existing text of Chapter 6.2.2.5, whilst specifying to which bodies or organisations the provisions apply, in order to provide clear separation of the relevant functions. Consequently, clarification of the approval requirements will be obtained in terms of those applying to manufacturers, those to the initial inspection and test bodies and those to the periodic inspection and test bodies
6. Incorporating the Canadian proposals into 6.2.2.5 removes the need to produce a new chapter 6.2.2.6 and the consequential re-numbering of the following chapters and their references.

7. The United Kingdom also feels that reference should be made to ISO/IEC 17020:1998 “*General criteria for the operation of various types of bodies performing inspection*”, as although that document applies to inspection bodies operating in many industries, not just those concerned with pressure receptacles, it provides general criteria to be adopted in addition to those proposed by Paper 2002/37. Wherever possible, the UN should make use of properly constituted ISO standards when they are applicable.

Proposals

8. Re-title 6.2.2.5 as: “**Conformity assessment system and approval for manufacture and inspection of pressure receptacles**”
9. Re-word 6.2.2.5.1 to include the definition of “**Approval System**” as follows: “*Approval system means a system for competent authority approval of a body performing periodic inspection and test of pressure receptacles (the ‘periodic inspection and test body’), including the approval of that body’s quality system*”
10. In 6.2.2.5.2.1, add a new sentence following the existing first sentence as follows; “*In addition, the competent authority shall establish an approval system for the purpose of ensuring that the periodic inspection and test of pressure receptacles conform to the requirements of these regulations*”. Modify the third sentence as follows: “*In instances where the competent authority approving either a pressure receptacle or a body performing initial or periodic inspection and test is not the competent authority in the country of manufacture and initial inspection and test, the marks of the approval country of the periodic inspection and test body, and the country of manufacture shall be indicated in the pressure receptacle marking (see 6.2.2.6 and 6.2.2.7)*”. Also, the last sentence should read: “*The competent authority of the country of approval shall supply, upon request, evidence demonstrating compliance to this conformity assessment and approval system to its counterpart in a country of use*”.
11. Amend 6.2.2.5.2.2 as follows; “*The competent authority may delegate its functions in the conformity assessment and approval system, in whole or in part*”.
12. Amend 6.2.2.5.2.3 as follows; “*The competent authority shall ensure that a current list of approved initial and periodic inspection and test bodies and their identity marks, and approved manufacturers and their identity marks is available*”. This is to be followed by “**Inspection and Test Body**”.
13. Re-word 6.2.2.5.2.4 as follows; “*The initial and periodic inspection and test bodies shall be approved by the competent authority as inspectors of pressure receptacles and shall: ---*”. Sub clauses (a) to (h) should remain, with the exception of sub-clause (d) which should be re-worded simply as “*(d) ensure commercial confidentiality*”
14. Re-word 6.2.2.5.2.5 as follows; “*The initial inspection and test body shall perform ----*”
15. Introduce a new 6.2.2.5.2.6 as follows; “*The periodic inspection and test body shall perform pressure receptacle in-service periodic inspection and testing, to verify conformity with the relevant periodic inspection and test standards (see 6.2.2.5.6)*”.
16. Re-number the existing 6.2.2.5.2.6 as 6.2.2.5.2.7, and the existing 6.2.2.5.2.7 as 6.2.2.5.2.8. The remaining parts of the proposal contained under 6.2.2.6.2.5 become unnecessary
17. Re-title 6.2.2.5.3 as “**Quality system and audit of the manufacturer and inspection bodies**”

18. Re-word the first sentence of 6.2.2.5.3.1 as follows; *“The quality system shall contain all the elements, requirements and provisions adopted by the manufacturer and the inspection and test bodies”*. Re-word the third sentence as follows; *“The contents of the quality system shall in particular include adequate descriptions (where relevant) of: -----”*. At the end of the list, the following additional requirement should be included; *(j). the relevant pressure receptacle inspection and test, quality control, quality assurance and process operation instructions that will be used”*.
19. At the end of 6.2.2.5.3.1, the following should be added; *“Where appropriate, the relevant sections of ISO/IEC 17020:1998 may also be referred to”*.
20. In 6.2.2.5.3.2, delete the word *“initially”* in the first sentence. Re-word the first sentence of the second paragraph as follows; *“The manufacturer and the inspection and test bodies shall be notified of the results of the audit”*. Re-word the third paragraph as follows; *“Periodic audits shall be carried out, to the satisfaction of the competent authority, to ensure that the manufacturer and inspection and test bodies, maintain and apply the quality system and that the quality system continues to meet the requirements of these regulations. Reports of the periodic audits shall be supplied to the manufacturer and inspection and test bodies, and shall contain the conclusions of the audit and any corrective actions required”*.
21. Re-word 6.2.2.5.3.3 as follows; *“The manufacturer and the inspection and test bodies shall maintain the quality system as approved in order that it remains adequate and efficient. The manufacturer and the inspection and test bodies shall notify the competent authority that approved the quality system of any intended changes”*. The last sentence should remain unchanged.
22. The United Kingdom feels that the Approval process proposed in paper 2002/37 under section 6.2.2.6.4 is unnecessary as the subject matter is either dealt with in existing or modified clauses under 6.2.2.5, or is not relevant for periodic inspection and test bodies. Clauses 6.2.2.6.4.6 and 6.2.2.6.4.7 are also unnecessary.
23. At the end of existing clause 6.2.2.5.5, introduce a new clause 6.2.2.5.6 entitled **“Periodic inspection and test marking”**. This section should include part of section 6.2.2.6.5 proposed by paper 2002/37 as follows; *“The periodic inspection and test body shall affix the periodic inspection and test marking, including the body’s registered mark, to each approved pressure receptacle at the time of completion of the test”*.
24. Re-number 6.2.2.5.6 to 6.2.2.5.7 to read as follows; *“Records of pressure receptacle periodic inspection and tests (both passed and failed) shall be retained by the periodic inspection and test body for not less than the expiry of the periodic inspection and test period”*.

Consequential amendment;

25. A consequential amendment in clause 6.2.1.8 is also necessary due to the introduction of new text following paper 2002/37 and this INF paper. It is therefore proposed to re-title 6.2.1.8 as **“6.2.1.8 Requirements for initial and periodic inspection and test bodies”**. Re-word 6.2.1.8.1 as follows; *“Initial and periodic inspection and test bodies shall be independent from manufacturing enterprises and competent to perform the tests, inspections and relevant approvals required”*.