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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-second session, 2-6 December 2002,
agenda item 2)

ADDITIONAL PROVISIONS FOR THE TRANSPORT OF GASES

Comment on ST/SG/AC.10/C.3/42/Add.1 - ISO standards and approval of UN certified pressure receptacles

Transmitted by the Compressed Gas Association (CGA)

Background

1. A conformity assessment system and approval framework for UN certified pressure receptacles is specified in 6.2.2.5 of the Model Regulations, 12th revised edition. Related certification marking requirements are also specified in 6.2.2.6 of the Model Regulations, 12th revised edition.
2. A list of ISO standards applicable to the design, construction, and initial inspection and test of UN certified pressure receptacles is specified in 6.2.2.1 of the Model Regulations, 12th revised edition.

As reported in ST/SG/AC.10/C.3/42/Add.1, the Working Group on the Additional Provisions for the Transport of Gases is considering three new ISO standards on the manufacture of composite cylinders, ISO 11119-1:2002, ISO 11119-2:2002, and ISO 11119-3:2002, for addition to that list.

ISO 11119-2:2002 contains text such as the following:

“5 Inspection and testing

Evaluation of conformity is required to be performed in accordance with the relevant regulations of *the country(ies) where the cylinders are used*. In order to ensure that the cylinders conform to this part of ISO 11119, they shall be subject to inspection and testing in accordance with clauses 6, 7, 8 and 9 by *an authorized inspection body* (hereafter referred to as “the inspector”) *recognized in the country(ies) of use*. The inspector shall be competent for the inspection of cylinders.”

“8.2.9 If the results of the verifications...are satisfactory, *the inspector shall issue a design approval certificate*, a typical example of which is given in annex A.”

“8.3.1 No alteration shall be made to the design or to the method of manufacture after approval unless *such alteration has received the prior agreement of the inspector.*”

ISO 11119-1:2002 and ISO 11119-3:2002 contain text similar to the above.

In reviewing the other ISO standards already listed in 6.2.2.1 of the Model Regulations, 12th revised edition, each of the standards was found to contain some text similar to that above.

3. The Compressed Gas Association (CGA) is concerned that such text contained in the ISO standards could appear to be contradictory to the conformity assessment system and approval framework specified in 6.2.2.5. These conflicting sections of the ISO standards are not clearly excluded from application in 6.2.2.1.

Proposal

CGA would like to request that the Sub-Committee and the Working Group on Additional Provisions for the Transport of Gases consider the following amendments:

Current text:

6.2.2.1.1 The following standards apply for the design, construction, and initial inspection and test of UN certified cylinders:

6.2.2.1.2 The following standards apply for the design, construction, and initial inspection and test of UN certified tubes:

6.2.2.1.3 The following standards apply for the design, construction, and initial inspection and test of UN certified acetylene cylinders:

Proposed text:

6.2.2.1.1 The following standards apply for the design, construction, and initial inspection and test of UN certified cylinders, **except that inspection requirements related to the conformity assessment system and approval shall be in accordance with 6.2.2.5:**

6.2.2.1.2 The following standards apply for the design, construction, and initial inspection and test of UN certified tubes, **except that inspection requirements related to the conformity assessment system and approval shall be in accordance with 6.2.2.5:**

6.2.2.1.3 The following standards apply for the design, construction, and initial inspection and test of UN certified acetylene cylinders, **except that inspection requirements related to the conformity assessment system and approval shall be in accordance with 6.2.2.5:**
