

INF.5 E

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the
Working Party on the Transport of Dangerous Goods
(Bern, 7-11 March 2005)

REPORT OF THE MEETING OF THE WORKING GROUP ON CHAPTER 6.2
HELD IN BRUSSELS 12th JANUARY 2005

Transmitted by the European Industrial Gases Association (EIGA)

SUMMARY

Executive summary:

The working group has agreed a structure and a basis for re-arranging the text into the new sections. ACI has volunteered to list the UN and RID/ADR text side by side to facilitate the further work.

Action to be taken:

The Joint Meeting to agree to the structure and the continued development of a new Chapter 6.2 as described below. Comment is invited on the specific issue of mutual recognition raised in paragraph 7.

General

1. The Working Group on restructuring Chapter 6.2 of the RID/ADR met on 12th January 2005 under the chairmanship of Mr. H. Puype (EIGA). Mr. Puype had to leave during the meeting and was replaced by Mr P. Wolfs (EIGA). Representatives of Austria, Belgium, France, Germany, Poland, Sweden, Switzerland, the United Kingdom, the European Commission, the European Cylinder Makers Association (ECMA), the European Liquefied Petroleum Gas Association (AEGPL), the Independent Controllers Association (ACI) and the European Industrial Gases Association (EIGA) participated.
2. The remit of the Working Group was in accordance with paragraph 41 of the report TRANS/WP.15/AC.1/96, namely:

- Determination of a structure for Chapter 6.2 so as to minimize future work on transposing amendments to the United Nations Model Regulations;
 - Drafting of a specific text in conformity with the new structure that would respect the four principles of:
 - User-friendliness
 - Harmonization with the United Nations Model Regulations
 - Concision
 - Deletion of superfluous requirements
3. The following documents were considered by the meeting:
- Documents from the Joint Meeting:
- TRANS/WP.15/AC.1/2004/21 (EIGA)
 - TRANS/WP.15/AC.1/2004/GE/INF.21 (Belgium)
- Documents circulated before the meeting:
- Restructuring of Chapter 6.2 of RID/ADR (UK)
 - Comments of Switzerland to the EIGA Proposal TRANS/WP.15/AC.1/2004/21 (CH)
 - Proposal for renumbering chapter 6.2 RID/ADR in accordance with the UN Model Regulation (CH)
 - Integration of the Transportable Pressure Equipment Directive (TPED) into ADR (UK)
- Document circulated at the meeting:
- Comments of AEGPL to the EIGA Proposal TRANS/WP.15/AC.1/2004/21 (AEGPL)
4. The preliminary discussion concerning the remit and the agenda proposed by EIGA concluded that the possibility of integrating some or all of the TPED into the RID/ADR should be included. It was recognised that the remit given by the Joint Meeting did not cover this matter but delegates decided it would be necessary to exchange information and views and to take the nature of this possible development into account in order to avoid further need for restructuring.
5. Information was exchanged on the nature of the different conformity assessment systems and their practical effect but it was concluded that for the purpose of the working group's immediate task it was merely necessary to accommodate the differing systems. Any rationalisation would be a long term development.
6. In response to a question about the possibility of alternative conformity assessment routes being introduced into the Model Regulations the Chairman said the chances were slight. The delegate from the ECMA stated that the single system defined in the Model Regulations did offer more flexibility than was at first apparent since the competent authority could delegate its duties in whole or in part. The discussion concluded that there could be scope for UN to accept something similar to the Alternative Arrangements of the portable tanks and for RID/ADR (and the TPED) to provide a reduced number of options, eventually leading to convergence of RID/ADR and UN.
7. Germany drew the working group's attention to the work in progress at RID on the recognition of tank car certificates from other Member States. Germany believed that the Joint Meeting should be asked to initiate a discussion on a similar initiative in the context of approval of receptacles and tanks.
8. There was general agreement that the ultimate objective for Chapter 6.2 was that there should be global regulations and global standards for pressure receptacles. It was therefore necessary that the UN Model Regulations should be reproduced unchanged in the RID/ADR. This also had the advantage of making incorporation of UN amendments easy.

Structure of Chapter 6.2

9. There were four proposals for the structure of Chapter 6.2, given in the papers from EIGA, Belgium, UK and Switzerland. EIGA formally withdrew its proposed structure and the remaining three proposals were presented by their authors.

10. The UK's suggestion to relegate the UN's general requirements to the section covering pressure receptacles made not according to the standards was not supported. The general requirements should appear first since they influenced the content of the standards.
11. The Swiss suggestion to renumber RID/ADR to follow the UN scheme was thought not to provide as user-friendly a solution as the Belgian proposal since the two sets of requirements would be mixed together as in the case of the EIGA proposal.
12. After discussion, the following structure based on the Belgian proposal was agreed for Chapter 6.2.

REQUIREMENTS FOR THE CONSTRUCTION AND TESTING OF PRESSURE RECEPTACLES BEARING THE UN MARK

- 6.2.1 *[Contains section 6.2.1 of the UN Model Regulations]*
- 6.2.2 *[Contains section 6.2.2 of the UN Model Regulations]*

REQUIREMENTS FOR THE CONSTRUCTION AND TESTING OF PRESSURE RECEPTACLES NOT BEARING THE UN MARK

- 6.2.3 **General requirements**
[Contains references to section 6.2.1 and adds the additional general requirements and items not covered by the UN Model Regulations]
- 6.2.4 **Pressure receptacles not bearing the UN mark designed, constructed and tested according to standards**
[Contains a reference to section 6.2.2 and adds the list of all references to standards that are not listed in the UN Model Regulations]
- 6.2.5 **Pressure receptacles not designed, constructed and tested according to standards**
[Contains section 6.2.3 of RID/ADR and parts of 6.2.1 of RID/ADR not inserted in 6.2.3]
- 6.2.x **Provisions for mutual acceptance of approvals and testing certificates**
[Space reserved for future development of relevant provision of RID/ADR]
- 6.2.y **General requirements for aerosol dispensers and small receptacles containing gas (gas cartridges)**
[Contains the existing section 6.2.4 of RID/ADR]

13. The working group concluded that splitting of the regulations into UN Model Regulations on their own followed by the variations required or allowed by RID/ADR would be user-friendly since it would minimise the repetition and make very clear which are the relevant requirements and what they are. Section 6.2.3 will only list differences. There is a similar structure in RID/ADR sections 6.8.2 and 6.8.3.
14. Sweden queried the status of the ISO standards, since the proposed structure provided the ISO standards with a status equal to the EN standards, even though the Joint Meeting's Standards Working Group had not assessed them.
15. The proposed paragraph 6.2.x was included to further emphasise the need to address mutual recognition as stated above in paragraph 7.
16. Discussion of how the working group should proceed in writing section 6.2.3 led the ACI to offer to draw up a document which had two columns. The UN text would be in the left-hand column

and the corresponding text from the RID/ADR would be shown on the right hand side. The working group accepted this offer gratefully.

17. Austria observed that the section 6.2.y should be in two parts, one for aerosols and one for receptacles, small since these two types of receptacles were very different. The working group agreed that his was outside the scope of their remit.

Examination of TRANS/WP.15/AC.1/2004/21 (EIGA)

18. The working group then turned to examination of TRANS/WP.15/AC.1/2004/21 (EIGA) since until ACI produced the side-by-side texts of RID/ADR and UN, this was a source for some of the questions that would need to be answered.
19. RID/ADR 6.2.1.1 required that pressure receptacles be designed for ‘normal use’ and ‘normal conditions of carriage’ and use whereas the UN required design for transport only. The consensus was that ‘use’ should disappear from a transport regulation. The other additional RID/ADR 2005 text in this section should be repeated in RID/ADR 6.2.3. A further possibility was to examine whether some of the text was made redundant by 4.1.1 or should be transferred there.
20. The RID/ADR requirement in 6.2.1.1 that metals for welded pressure receptacles shall guarantee adequate impact strength at - 20° C was considered essential and a proposal should be made to insert this requirement in the Model Regulations. RID/ADR 6.8.2.1.10 has suitable text.
21. RID/ADR section 6.2.1.1.2 – requirements for acetylene cylinders should appear in the new 6.2.3.
22. RID/ADR 6.2.1.1.3 adds the list of classification codes to further define toxic liquefied gas. This was deemed unnecessary.
23. RID/ADR 6.2.1.2 has a list of materials which ‘may’ be used. Opinions differed on the value this list and the whole list was placed in square brackets for further discussion. EIGA argued that the choice of materials is governed by the compatibility requirements of ISO 11114-1 and 11114-2 and the general requirements to meet the pressure and service conditions and an illustrative list was unnecessary. Other delegates thought the list was valuable and should be expanded by adding e.g. titanium. Opinions also differed on whether this should be a general requirement or a requirement when standards are not used.
24. UN 6.2.1.3 requires that all valves, piping, fittings and other equipment subjected to pressure shall be designed and constructed to withstand at least 1.5 times the test pressure of the pressure receptacles. This has never been a requirement of non-UN receptacles in RID/ADR and EIGA believes it is unnecessary to specify such high strength for normal conditions of transport. For example, RID/ADR 6.2.1.3.2 (d) requires that the bundle manifold and cylinder have the same test pressure. The working group decided to leave this debate for the future since some wanted more time to consider whether that RID/ADR should follow the UN requirement.
25. The working group agreed that it would need to review the cross-references to P200, P203 and 4.1.6 to make sure that the UN requirements were faithfully reproduced.
26. The EIGA proposal for 6.2.1.3.6.5.4 was rejected; the text in the UN requires no modification.
27. For the hydraulic proof pressure test conducted during the initial inspection and test UN pressure receptacles shall withstand the test pressure “without expansion greater than that allowed in the design specification”. For RID/ADR the criterion is “without permanent deformation or exhibiting cracks”. This distinction would need to be maintained.

28. The working group adjourned and agreed to reconvene after the Joint Meeting in March 2005 had agreed on the proposed structure and would work on the basis of the comparison document that ACI had proposed to produce.
-