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Geneva, 11-21 September 2007
Item 6 (a) of the provisional agenda

PROPOSALS OF AMENDMENTS TO RID/ADR/ADN */

Pending issues

Period of Validity of Type Approval Certificates and Transition Periods for Standards

Transmitted by the European Cylinder Makers Association (ECMA)

Executive summary: 1. The TPED states that EC Type-examination certificates should be valid for ten years and should be renewable. The ECMA requests that this feature of the TPED is transferred into the new section 1.8.7 to cover RID/ADR type approval certificates.

2. If standards mentioned in type approval certificates are superseded in the RID/ADR, transitional provisions will be necessary to allow the continued use of such type approvals until they can be updated to reference the equivalent current standard.

Action to be taken: 1. Add text to 1.8.7.2
2. Discuss the possible transition measures to permit the extended use of superseded standards in these type approvals.

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Related documents: ECE/TRANS/WP.15/AC.1/106; ECE/TRANS/WP.15/AC.1/106/Add.2; European Directive 1999/36/EC.

1. This proposal is in two parts; the first is put forward for immediate adoption and the second is for consideration for the 2011 edition of the regulations. However, the two parts are inter-related and should be considered together.

Part 1: Period of Validity of Type Approval Certificates

Introduction

2. Module B of Annex IV of the Transportable Pressure Equipment Directive contains the procedure for EC type-examination and this has been transferred into the RID/ADR as type approval in sub-section 1.8.7.2. However, there is one important omission which this proposal seeks to correct. The second sentence of Module B paragraph 5 states:

“The certificate, *which should be valid for 10 years and be renewable*, must contain the name and address of the manufacturer, the conclusions of the examination and the necessary data for identification of the approved type.”

3. The part of the above extract shown in italics is not found in section 1.8.7. It is important to specify the life of the approval. On the one hand it provides for a complete review by the inspection body every 10 years and on the other, it saves the manufacturer from the unnecessary costs of more frequent re-approval. In the case of pressure receptacles, investment in production machinery and plant is necessary to produce a new type and the manufacturer needs reassurance that his investment will remain in service long enough to recoup its costs.

Proposal

4. Add the following sentence at the end 1.8.7.2.3.

The type approval certificate shall be valid for ten years and shall be renewable.

Justification

5. This simple change will bring uniformity of practice and ensure periodic review of type approvals.

Part 2: Transition Periods for Standards

Introduction

6. The European cylinder makers, with the other stakeholders, are participating vigorously in the work of the standardisation committees to achieve global harmonisation of gas cylinder standards. This means that many quite new European cylinder standards will be replaced by EN

ISO standards in the coming months. These new standards will be technically similar to their predecessors and will continue to meet the same essential requirements of the RID/ADR.

7. The following standards are scheduled to be replaced by equivalent EN ISO standards before the text of the 2011 edition of the RID/ADR is finalised.

Current standard		Replacement standard
EN 1964-1: 1999	Transportable gas cylinders - Specification for the design and construction of refillable transportable seamless steel gas cylinders of water capacities from 0,5 litres up to and including 150 litres - Part 1 : Cylinders made of seamless steel with an <i>R_m</i> value of less than 1100 MPa	EN ISO 9809-1
EN 1964-2: 2001	Transportable gas cylinders - Specification for the design and construction of refillable transportable seamless steel gas cylinders of water capacities from 0,5 litres up to and including 150 litres - Part 2 : Cylinders made of seamless steel with an <i>R_m</i> value of 1100 MPa and above	EN ISO 9809-2
EN 1975: 1999	Transportable gas cylinders - Specification for the design and construction of refillable transportable seamless aluminium and aluminium alloy gas cylinders of capacity from 0,5 litres up to 150 litres	EN ISO 7866
EN 13322-1: 2003 +A1: 2006	Transportable gas cylinders - Refillable welded steel gas cylinders - Design and construction - Part 1 : Carbon steel	EN ISO 4706

8. The ECMA members hold about 300 type approvals using these EN standards. These approvals will be expensive to renew simply to take account of the changed standards. Although some will only involve paper studies others will involve new testing and the total cost to the ECMA members is estimated to be approximately €2 Million. Also, given the number of standards and the number of manufacturers, there are doubts about the availability of the experts necessary to carry out this mass renewal of type approvals. Time is therefore needed to make the transition from these standards.

9. The need for transition has already been recognised by the Tanks Working Group and at the last Joint Meeting it was agreed all newly listed construction standards for tanks and pressure receptacles should be optional for the first two years and the displaced standard would continue to be valid for this period (see paragraph 7 of ECE/TRANS/WP.15/AC.1/106). However, given the magnitude of the task for pressure receptacles and to match the ten year life of type approval certificates, the ECMA requests the Joint Meeting to consider extending the life of the superseded pressure receptacle standards even longer. A proposal as to how this might be achieved by a transitional measure is given below.

Proposal

10. The following text could be adopted for use in the 2011 edition of the RID/ADR

1.6.2.X Type approval certificates for pressure receptacles issued before 1 July 2011 which refer to the standards listed below shall not be renewed but may continue to be used until their renewal dates and in any case shall be invalid after 31 December 2020.

EN 1964-1:1999; EN 1964-2:2001; EN 1975:1999;
EN 13322-1:2003 +A1: 2006

11. For user- friendliness a Note referring to this transition clause could be added after the text proposed in part 1 of this paper.

Justification

12. The introduction of the use of new standards as type approval certificates expire will allow their progressive and economical introduction. Listing individual standards will allow the Joint Meeting to consider each case on its merits and require accelerated introduction of a new standard if it provides significant safety benefits.
