

**INLAND TRANSPORT COMMITTEE**

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods

Geneva, 15-19 September 2008  
Item 3 of the agenda

**STANDARDS**

**Report of the Standards Working Group (2)  
(11<sup>th</sup> meeting)**

The outcome of the discussion by the Standards Working Group of the comments submitted by Joint Meeting members to CEN standards at inquiry and formal vote stage are summarized in the following tables. The STD WG was chaired by Mr K. Wieser with the attendance of Joint Meeting delegates and representatives of AEGPL, ECMA and EIGA.

At this stage there were no new or additional standards recommended to be taken into reference nor existing references to be amended. A report, summarizing the results of the discussion of the STDs WG was submitted to plenary as **INF.31**.



## A. Standards at Stage 2: Submitted for Public Enquiry

Dispatch from CEN, dated 25 June 2008

<a href="#">prEN ISO 9809-1</a> Second enquiry	<b>Gas cylinders - Refillable seamless steel gas cylinders - Design, construction and testing - Part 1: Quenched and tempered steel cylinders with tensile strength less than 1 100 MPa (ISO/DIS 9809-1:2008)</b>		Where to refer in ADR/RID: <b>6.2.4</b>	Applicable sub-sections and paragraphs: <b>6.2.3.1. and 6.2.3.4</b>	
<a href="#">CEN consultants assessment dated 9.6.2008</a>					
<b>Comments from members of the Joint Meeting:</b>					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	2	In EN ISO 10286 the definition of working pressure conforms to the definition in RID/ADR 1.2.1	None: this answers the CEN consultant's query in his assessment of the normative references.	Thanks!	Clarified.
UK	11.2.2	The volumetric expansion test allows some permanent expansion in contradiction of RID/ADR 6.2.3.4.1 (g)	Annex NA should forbid the use of the volumetric expansion test, or industry make a case to delete or amend RID/ADR 6.2.3.4.1 (g), or the reference in RID/ADR 6.2.4 exclude this clause.	Support expert discussion and clarification in RID/ADR	The WG takes note that ECMA and EIGA intend to submit a justification (detection method for miss- heat treatment) for this test and an application to align RID/ADR with UN.
CH	11.2.2	The volumetric expansion test is to be excluded from RID/ADR.		If this test is common practise, it should be included in RID/ADR after expert discussion.	
CH	13 and Annex NB	prEN ISO 13769 shall not be referenced.		See below	See next line.
<p>The STDs WG, recalling earlier discussion on this subject, rejects a reference to this standard, basically because the RID/ADR provisions on that subject are already comprehensive and because of the potential risk of temporary inconsistencies between regulations and standard.</p> <p>A clear reference to the RID/ADR marking provisions should replace the normative reference to EN/ISO 13769. This would not preclude the inclusion of specifications on additional markings in design standards.</p> <p>To facilitate the application of the marking provisions it seems possible to copy it in an informative Annex, indicating the RID/ADR version together with a warning that RID/ADR is updated regularly at intervals of two years, which may impair the Annex. CEN (Consultant) could provide for a pattern for this solution for the benefit of uniform wording.</p> <p>Given the case that EN/ISO 13769 would be maintained and continued to be taken into normative reference in some standards, the STDs WG states the potential of this standard to conflict with RID/RID and would keep it under review for conformity with RID/ADR.</p>					
CH	13	Why is there no reference to lower temperature as in prEN ISO 9809-3?		To be checked.	Sufficient justification was given; only Part 3 includes the option to perform impact material tests at different lower

					temperatures, related to different service temperature limits.
UK	NA.1	EN ISO 11114-4 does forbid the use of Method C in the Annex NA	None: this answers the CEN Consultant's query.	Thanks!	Clarified.
UK	NA2; 5 Note	The Directive 99/36/EC will be repealed in July 2011	Retain the note to cover the time until the Directive is repealed, but see our comment on Annex NB	No objection	UK's proposal is supported.
UK	NA2; 13	Marking shall be in accordance with the regulations. EN ISO 13769 should be an informative reference	Suggest "Marking shall be in accordance with the relevant regulations. EN ISO 13769 gives guidance on the application of these markings." Or follow the suggestion of the CEN Consultant.	Support in principle the repetition of marking provisions as long the precedence of RID/ADR and the risk of temporary inconsistencies is clearly indicated.	See above on clause 13.
UK	Annex NB	This Annex is obsolescent and since it provides guidance on all modules, it conflicts with the note in NA2	Delete Annex NB	Agree. However, the relevant new RID/ADR paragraphs could be reproduced in this Annex.	The WG would support the same approach as for the marking issue (reference in Clause 5 to of an excerpt of the relevant UN regulations in an informative Annex and to RID/ADR 1.8.7 in the European Annex.
CH	Annex NB	I do not see any advantage of the amendment to "5 Inspection and Testing" and the table in Annex NB as the descriptions of type approval and inspection bodies are part of RID/ADR 2009 and the TPED will be changed very soon. There should be a clear partition between legal and technical aspects		See above.	
UK	CEN Consultant's Assessment on Clause 5	The detailed comments appended to the assessment should be sent to the relevant TC for consideration, but the UK makes some general remarks on the Consultants comments in the next column	1. In Part 5 "Competent authority of the country of manufacture" should be ". . . country of approval" since manufacture may be in another country. 2. Reference to EN ISO 17020 should be informative only since the ISO standard will be used in countries with differing criteria. Since we are dealing with the inspection of new cylinders only Type A is relevant.	Comments have been sent to ISO/TC 58/SC3/WG3 – CEN/TC 23/SC1/WG1 and will be dealt with on Oct. 9/10, 2008	See next line.

The WG supports UK's remarks in 4<sup>th</sup> column with the effect, that the proposed revised heading and introductory paragraph would read:

"5 Conformity assessment system - Cylinders built according to this standard are subject to the conformity assessment system outlined in clauses 9,10 and 11, consisting of the testing and

approval of the design type, **the approval and survey of a quality system of the manufacturer**, in combination with the initial inspection and testing of batches of cylinders and all cylinders manufactured according to the design type.

**NOTE: UN requires that the bodies taking responsibility for these activities are the competent authority of the country of approval, who may delegate its functions in whole or in parts and inspection bodies approved by the competent authority.”**

<a href="#">prEN ISO 9809-2</a> Second enquiry	<b>Gas cylinders - Refillable seamless steel gas cylinders - Design, construction and testing - Part 2: Quenched and tempered steel cylinders with tensile strength greater than or equal to 1 100 MPa (ISO/DIS 9809-2:2008)</b>	Where to refer in ADR/RID: <b>6.2.4</b>	Applicable sub-sections and paragraphs: <b>6.2.3.1. and 6.2.3.4</b>
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[CEN consultants assessment dated 9.6.2008](#)

**Comments from members of the Joint Meeting:**

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		Same comments as for EN ISO 9809-1			See comments above
CH		Same comments as for EN ISO 9809-1			

<a href="#">prEN ISO 9809-3</a> Second enquiry	<b>Gas cylinders - Refillable seamless steel gas cylinders - Design, construction and testing - Part 3: Normalized steel cylinders (ISO/DIS 9809-3:2008)</b>	Where to refer in ADR/RID: <b>6.2.4</b>	Applicable sub-sections and paragraphs: <b>6.2.3.1. and 6.2.3.4</b>
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[CEN consultants assessment dated 9.6.2008](#)

**Comments from members of the Joint Meeting:**

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		Same comments as for EN ISO 9809-1			See comments above
CH		Same comments as for EN ISO 9809-1 except comment on lower temperature limits.			

<a href="#">prEN 14638-3</a>	<b>Transportable gas cylinders - Refillable welded receptacles of a capacity not exceeding 150 litres - Part 3: Welded carbon steel cylinders made to a design justified by experimental methods</b>	Where to refer in ADR/RID: <b>6.2.4</b>	Applicable sub-sections and paragraphs: <b>6.2.3.1. and 6.2.3.4</b>
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CEN consultants assessment dated [27.6.08 on 2<sup>nd</sup> enquiry draft](#)

**Comments from members of the Joint Meeting:**

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	2, A.3.6, B.2.4, Annex C	Reference to EN 25817 to be replaced by EN ISO 5817.		To be checked.	Replacement supported.
UK	4.1.2	The term “bung” is not defined.	Define bung	Alternatively, a more common term (plug?) could be used.	Agreed to find a more common term, such as “boss”.
UK	5.2	The requirement in the note is normative.	Make the requirement part of the normative text.	Agree. If the text of the Note is a quotation then the source need to be added.	Transformation of the Note into a clause supported.
UK	6.4.3	“The footing, if attached, shall be drained” has no meaning in strict English.	Suggest “The footing, if attached, shall have drainage”	Agree.	UK wording supported.
UK	7	Agree CEN Consultant’s comments on headings of this section	May be even better to separate into “Batch tests” and “Tests on every cylinder” as per ISO 9809 series.	-	New conformity assessment system to be considered as proposed by consultant.
CH	7.6.2.7 b)	There seems to be a discrepancy between the requirement in 7.6.2.7 b) "bursting test or NDT" and Annex A.2. In the Annex an X-ray has to be done anyway?		To be checked.	Alternative included in 7.6.2.7 b) to be added in Annex A.2 or deleted.
CH	8	prEN ISO 13769 shall not be referenced.		Support in principle the repetition of marking provisions as long the precedence of RID/ADR and the risk of temporary inconsistencies is clearly indicated.	Addition of Notes supported as proposed by consultant.
UK	7.1	CEN Consultant’s comments	“country of manufacture” should be “country of approval”.	?; can’t find term in my assessment	See next line.

The addition of a Note under clause 7.1 is supported as proposed by consultant, and amended by UK, which would the read:

“NOTE: Cylinders built according to this standard are subject to the conformity assessment system outlined in the Regulations [1 - 4], consisting of the testing and approval of the design type, **the survey of the manufacturer**, in combination with the initial inspection and testing of batches of cylinders and all cylinders manufactured according to the design type.

The bodies taking responsibility for these activities are the competent authority of the country of approval, who may delegate its functions in whole or in parts and inspection bodies approved by the competent authority.”

<a href="#">prEN ISO 28622</a>	<b>Pressure relief valves for transportable refillable cylinders for liquefied petroleum gas (LPG) (ISO/DIS 28622:2008)</b>	Where to refer in ADR/RID: <b>6.2.4</b>	Applicable sub-sections and paragraphs: <b>6.2.3.1 and 6.2.3.3</b>		
<a href="#">CEN consultants assessment dated 23.6.08</a>					
<b>Comments from members of the Joint Meeting:</b>					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	6.1.8	The term "permanent deformation pressure" is not specified in any standard. Test pressure would be a correct term.		Agree!	An amendment using defined terms compliant with the regulatory texts is suggested.
UK	6.4.7 after the comma	"maximum operating pressure of the cylinder" is not defined in either this standard or in RID/ADR.	This requirement is not related to the design, testing and marking requirements of the PRV, but is related the PRV's use. Delete.	Don't agree with reasoning under "Proposed change". This clause seems to be a performance test requirement governing the re-closing after the release of overpressure.	As above.
UK	7.5	Does "Each valve" mean every valve or all sample valves or each of three sample valves? Are these the valves used in 7.4?	Specify how many valves shall be tested and clarify whether they are new samples or others used previously.	Seems to be a language issue.	Term "each" to be deleted.
UK	7.6 and 7.7	These tests state "Repeat the test for all three valves". Are these the three valves used in 7.4? or three new valves?	Clarify the samples to be used	Seems to be a language issue.	Intention to be clarified (possibly with a sampling plan) and wording to be improved.
UK	8	The absence of a normative plan for production testing is a profound weakness	Make Annex D normative	Supported.	Normative Annex supported.
CH	6.1.7, 7.4.5, Annex C	Annex C should be mandatory for the minimum discharge capacity.		To be discussed.	The WG supports a mandatory requirement on the release capacity in 6.1.7 with an adaptation of 7.4.5 and with reference to Annex C.
UK	Annex D, final sentence	"within 615% of the nominal set pressure." must be wrong	Change to "within 15% of the nominal set pressure."	To be corrected.	To be corrected.

## B. Standards at Stage 3: Submitted for Formal Voting

Dispatch from CEN, dated 25 June 2008

<a href="#">prEN 12245</a>	<b>Transportable gas cylinders - Fully wrapped composite cylinders</b>	Where to refer in ADR/RID: <b>6.2.4</b>	Applicable sub-sections and paragraphs: <b>6.2.3.1 and 6.2.3.4</b>		
<a href="#">CEN consultants assessment dated 20.6.2008</a>					
<b>Comments from members of the Joint Meeting:</b>					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	7	The CEN Consultant is proposing a new amendment on marking which overlaps with the Note at the end of Clause 7 requested at the last meeting of the Standards WG.	Replace the first two sentences of Clause 7 by the following. “Marking shall be in accordance with the ADR/RID regulations. EN ISO 13769 gives guidance on the application of these markings and the normative requirement for marking the design (/service) life. The following specific additional information shall be included on a permanent marking label which shall be separated by a space from the markings required by ADR/RID.” Delete the Note	Seems to be a misunderstanding. At this stage, editorial amendments are acceptable, only. Adding of a Note is considered to be editorial. The proposed text would be a real requirement, referring to European law which is not acceptable under CEN rules. The proposed Note is considered equivalent.	1 <sup>st</sup> paragraph of Clause 7 and Note at the end are still not considered adequate. It’s suggested to launch an amendment to the standard to reword the clause in line with the UK proposal. It’s further recommended that a general text is provided by CEN (Consultant) for similar standards including marking requirements. The term “label” is proposed to be replaced with a less conflicting term, such as “marking label”.
<b>Decision of the STD’s WG:</b>		Accepted <input type="checkbox"/> Refused <input type="checkbox"/> <u>Postponed</u>	<b>Comments:</b> An amendment need to be launched to improve the regulations on marking.		

<a href="#">prEN ISO 13769</a>	<b>Gas cylinders - Stamp marking (ISO 13769:2007)</b>	Where to refer in ADR/RID: <b>6.2.4</b>	Applicable sub-sections and paragraphs: <b>6.2.3.9</b>		
<a href="#">CEN consultants assessment dated 22.5.2008</a>					
<b>Comments from members of the Joint Meeting:</b>					



Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	All	The UK is not in favour of including this standard in the regulations due to the creation of two descriptions of the same legal requirements which can lead to uncertainty of interpretation. Also, it creates a problem of maintaining synchronous change by CEN and UNECE/OCTI	This standard is helpful to practitioners to agree the marking position details and elements not in the regulations such as the expiry of time-limited composite cylinders. The Standards WG has previously declined to reference the LPG marking standard.		See last line of table.
CH	All	Die Norm ISO 13769 wurde schon 3einmal diskutiert. Diese Norm sollte nicht ins RID/ADR aufgenommen werden. Die Kennzeichnung ist in den Regelwerken ausführlich und abschließend beschrieben. Sie sollte deshalb bei allen Normen, in denen Sie erwähnt wird, ausgeschlossen werden resp. eine Note in der Norme eingefügt werden analog zu EN 12245 Artikel 7. Zudem ist anzumerken, dass die UAP zu dieser Norm zurückgezogen wurde.	(ISO 13769 has already been discussed 3 times. It shouldn't be referenced in RID/ADR. Marking requirements are comprehensively and definitively covered by the provisions. It should be exempt from all referenced standards or a Note in accordance with the one in EN 12245, clause 7 be added. It is to be noted, that the UAP of the standard has been withdrawn.) ((The Note reads: "NOTE The marking of cylinders is subject to the ADR/RID regulations. These require that additional marking shall not conflict with required marks. This is achieved if the additional marking is separated from the required marks by a space. ""))	Support in principle the repetition of marking provisions as long the precedence of RID/ADR and the risk of temporary inconsistencies is clearly indicated.  With respect to the 2 <sup>nd</sup> comment, it is to say that a new UAP will be launched shortly.	
<p>The STDs WG, recalling earlier discussion on this subject, rejects a reference to this standard, basically because the RID/ADR provisions on that subject are already comprehensive and because of the potential risk of temporary inconsistencies between regulations and standard. A clear reference to the RID/ADR marking provisions should replace the normative reference to EN/ISO 13769. This would not preclude the inclusion of specifications on additional markings in design standards. To facilitate the application of the marking provisions the Consultant deems it as possible to copy it in an informative Annex, indicating the RID/ADR version together with a warning that RID/ADR is updated regularly at intervals of two years, which may impair the Annex. He would be prepared to provide for a pattern for this solution for the benefit of uniform wording. Given the case that EN/ISO 13769 would be maintained and continued to be taken into normative reference in some standards, the STDs WG states the potential of this standard to conflict with RID/RID and would keep it under review for conformity with RID/ADR.</p>					
<b>Decision of the STD's WG:</b>		Accepted <input type="checkbox"/> Refused <b>X</b>	<b>Comments:</b> See above.		

<a href="#">prEN 15507</a>	<b>Packaging - Transport packaging for dangerous goods - Comparative material testing of polyethylene grades</b>	Where to refer in ADR/RID: <b>6.1.5.2.5 and 6.5.4.3.4</b>	Applicable sub-sections and paragraphs: <b>6.1.5.2.5 and 6.5.4.3.4</b>
<a href="#">CEN consultants assessment dated 18.4.2008</a>			

<b>Comments from members of the Joint Meeting:</b>					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	All	We don't object in principle to quoting the standard and we do support it, but because it references other standards that are not referenced in ADR we think it is premature to quote this unless the others are referenced.			See next line.
<p>Taking account of INF.19, questioning the validity of the procedures described in prEN 15507, the STDs WG will await an adequate response and the result of the voting on this standard which is scheduled for October 2008. It will then deal with a reference in RID/ADR as applied for in INF.11.</p> <p>The group also suggests that normative references in 15507, the text of which has directly been incorporated in RID/ADR (EN 16101 and 23667) should be replaced by references to the relevant RID/ADR provisions.</p>					
<b>Decision of the STD's WG:</b>		Accepted <input type="checkbox"/> Refused <input type="checkbox"/> <u>Postponed</u>	<b>Comments:</b>		

<a href="#">prEN 1626</a>	<b>Cryogenic vessels - Valves for cryogenic service</b>	Where to refer in ADR/RID: <b>6.2.4</b>	Applicable sub-sections and paragraphs: <b>6.2.3.1 and 6.2.3.3</b>		
<a href="#">CEN consultants assessment dated 7.3.2008</a>					
<b>Comments from members of the Joint Meeting:</b>					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	All	This should remain as a supporting standard; it is a normative reference in EN 1251-2:2000. This standard relates to valves for non-transport applications also and it is a harmonised standard under the PED. .	Note: The valves used on a cryogenic receptacle or tank are recorded in the type approval, unlike gas cylinders. Assessment of the suitability of valves is part of the type approval process.	Nevertheless, Note 2 of the Scope says that "All safety valves covered in this standard correspond to category IV of PED and category III of <u>TPED</u> . Obviously, this suggests a use for transportable vessels.	The WG recommends that the relevant standardizing body reconsiders the Scope of the standard and the implications of additional references to this standard in Part 4 and Section 6.2 of RID/ADR.
<b>Decision of the STD's WG:</b>		Accepted <input type="checkbox"/> Refused <input type="checkbox"/> Postponed	<b>Comments:</b>		

<a href="#">prEN 13648-1</a>	<b>Cryogenic vessels - Safety devices for protection against ex-</b>	Where to refer in ADR/RID: <b>6.2.4</b>	Applicable sub-sections and paragraphs: <b>6.2.3.1 and 6.2.3.3</b>		
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		<b>cessive pressure - Part 1: Safety valves for cryogenic service</b>			
<a href="#">CEN consultants assessment dated 7.3.2008</a> CH comment: <a href="#">Annex</a> to assessment is missing.					
<b>Comments from members of the Joint Meeting:</b>					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	All	This should remains as a supporting standard. This standard relates to valves for non-transport applications also and is a harmonised standard under the PED.		So far, there are no standards on closures for cryogenic vessels referred to under RID/ADR 6.2.2 and 6.2.4, nor are equipment clauses part of design and construction standards for cryogenic vessels.	The WG confirms that the standards deals with a subject regulated by RID/ADR which would justify a reference. It recommends that the relevant standardizing body reconsiders the Scope of the standard and the implications of references to this standard in Part 4 and Section 6.2 of RID/ADR.
CH		The values for opening and closing of safety valves as given in RID/ ADR 2007/6.2.1.3.3.5.1 or RID/ADR 2009/6.2.1.3.6.5. In should be part of such a standard. The minimum would be an indication, that such values are important.		To be discussed.	It was realized that such a requirement is settled by normative references (EN 1426-1 and -4). However, this approach questions the added value of this standard and a reference to it in RID/ADR. The WG would be in favour of a comprehensive document.
<b>Decision of the STD's WG:</b>		Accepted <input type="checkbox"/> Refused <input type="checkbox"/> Postponed		<b>Comments:</b>	