

## **Economic Commission for Europe**

### **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, 13–17 September 2010

Item 3 of the provisional agenda

#### **Standards**

### **Consolidated comments by Members of the Joint Meeting on draft standards dispatched by CEN since the last session**

#### **Transmitted by the European Committee for Standardisation (CEN)**

1. Reference is made to document ECE/TRANS/WP.15/AC.1/2010/51, which informs about the progress made in the establishment of new and the revision of published EN and EN ISO standards referenced or intended to be referenced in the RID/ADR/ADN. It invites Members of the Joint meeting to comment on draft standards at enquiry and formal vote stage, provided on the dedicated CEN internet-site.
2. Since the last session of March 2010, four dispatches of six draft standards together with assessments by the CEN consultant were made available on the dedicated CEN website. All comments received are consolidated in this document. Additional comments received have been distributed as INF.15 rev.1 to the participants of the Working group.
3. The outcome of the discussion of these comments by the Working Group on Standards (Std's WG) has been added in this revision 2 of INF.15. It needs to be considered by the relevant standardizing bodies for the further preparation of the standards as conditional for their adoption for reference in RID/ADR/ADN.
4. Proposals on the amendment of RID/ADR/ADN to become effective by 1.1.2013 are part of the separate meeting report of the Working Group on Standards (**INF.33**).

## Annex

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

Dispatched by CEN on 28.4.2010

<b>prEN 13922</b>	<b>Tanks for transport of dangerous goods – Service equipment for tanks – Overfill prevention systems for liquid fuels</b>		<b>Where to refer in RID/ADR/ADN: No reference recommended</b>	<b>Applicable sub-sections and paragraphs: None</b>	
<p>Assessed by CEN consultant on 26.3.2010</p> <p>Summary of conclusions:  <i>prEN 13922 can be promoted to the formal vote stage. A few improvements are recommended.  It is not considered to be a candidate for reference in RID/ADR/ADN.</i></p> <p>Proposed follow-up action:  <i>No action required, as this standard is not related to RID/ADR/ADN-requirements.</i></p>					
<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		Agree that this standard does not relate to the requirements of RID/ADR and should not be referenced		./.	It is confirmed that this standard is not a candidate to be referenced in RID/ADR.

<b>prEN ISO/DIS 11118</b>	<b>Gas cylinders - Non-refillable metallic gas cylinders - Specification and test methods (ISO/DIS 11118:2009)</b>		<b>Where to refer in RID/ADR/ADN: 6.2.4.1</b>	<b>Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4</b>	
<p>Assessed by CEN consultant on 22.4.2010</p> <p>Summary of conclusions:  <i>With respect to the concordance of the requirements on UN- pressure receptacles it is important to know that there are some non- compliances between prEN ISO 11118 and RID/ADR/ADN 2009, as amended and to become effective by 1.1.2011. These need to be removed.  In addition, several deficiencies have been detected and need to be addressed for the formal vote version of the standard.  The absence of a European Annex is questioned, given the fact that comparable EN ISO standards include European Annexes to take account of specific European practices and needs. A European Annex is proposed.  Because of the number and significance of the shortcomings it is proposed to launch a second enquiry based on a new draft text.  prEN ISO 11118 is considered to be a candidate to replace EN 12205:2001 in RID/ADR, once it has been accepted for reference by the Standards Working Group and has been approved.</i></p>					

Proposed follow-up action: <i>This standard needs to be discussed by the STD's WG for reference in RID/ADR 6.2.4.1, Table, under "for design and construction" and related to subsections 6.2.3.1 and 6.2.3.4.</i>					
<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	General	The ISO and CEN Working Groups should respond to the recommendations of the CEN Consultant. ISO 11118 is already referenced in the UN Model Regulations and it may have been construed that this reference implies that at least some of the non-conformances with the Model Regulations are permissible for these particular receptacles. Nevertheless, the standard and the relevant regulations must either align or the regulations shall explicitly allow the non-conformances for the scope of the standard.		./.	It is strongly recommended that the standard is amended with respect to the shortcomings as indicated in the assessment of the Consultant before it is submitted again for reference in RID/ADR.
D	5.1.8	This clause which allows the filling of non-refillable cylinders with acetylene is not considered acceptable with regard to safety (Extent and costs of type testing, complexity and time consuming procedures, long ranging lifetime of porous masses). It is referred to the reasoning and outcome of discussion by the UN SCoE TDG in July 2006 (Doc. ST/SG/AC.10/C.3/2006/26)	ISO 11118 (and EN ISO 11118) shall not be referenced as applicable for acetylene cylinders.	Supported; See also WP's 16 and 46	This clause is asked to be amended to exclude the option of a filling of non- refillable cylinders with acetylene.
CH	Whole standard	We support the comments of the CEN consultant and its recommendations in the e-balloting template. As there are so many changes to be done, we will have to wait for the next stage to look at it again in detail.		./.	See comments above.

Dispatched by CEN on 24.8.2010

<b>prEN ISO 11372</b>	<b>Gas cylinders - Acetylene cylinders - Filling conditions and filling inspection (ISO/DIS 11372:2010)</b>	<b>Where to refer in RID/ADR/ADN: P200(11)</b>	<b>Applicable sub-sections and paragraphs: P200 (7), (10P)</b>
Assessed by CEN consultant on 23.8.2010 Summary of conclusions: <i>prEN ISO 11372 can be promoted to the formal vote stage. Some improvements are recommended. It is candidate for reference in RID/ADR.</i> Proposed follow-up action:			

*This standard needs to be discussed by the STD's WG as a replacement of EN 1801:1998, EN 12754:2001.in RID/ADR/ADN, subsection 4.1.4.1, P200 (11).*

**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	Whole standard	We support the comments of the CEN consultant and its recommendations in the e-balloting template.		./.	The WG supports that the findings of the Consultant are addressed adequately.
CH	4.2.1	Under clause 5.1 is a information concerning marking of solvent free acetylene cylinders. We believe that this information should be mentioned under clause 4.2.1		To be checked for the FV- text.	It is supported that the specific markings as specified in 5.1 are additionally mentioned in 4.2.1.
UK	4.2.1 d)	It is unclear whether the standard requires compliance with the either a) all the markings in ISO 13769, or b) only those marking elements in ISO 13769 which are specific to acetylene. If a) is intended, this will prevent the filling in accordance with this standard of many cylinders which are operated in accordance with national regulations which have fewer or different marking requirements from ISO 13769. Suggest making ISO 13769 as an example. Similarly, compliance with ISO 7225 is not always possible, due to national legislative requirements. The essential information requirements for acetylene are already specified in the preceding requirements of 4.2.1 and	Replace text of 4.2.1 d) by "Stamp marking, labelling and colour coding are appropriate for acetylene and in accordance with national requirements. Note: ISO 13769 and ISO 7225 show suitable marking and labelling requirements respectively, but national regulations take precedence over their requirements."	The addition of a Note is supported and has also been proposed in the assessment.	It is envisaged that markings can only be checked for compliance with marking requirements as required at the time of the initial inspection and test, e.g. 15 years ago. As an example, ISO 13769 was not yet available at that time. It is suggested that the following wording is used for 4.2.1 d):  <i>d) the stamp marking, labelling and colour coding, as required by regulations and standards as relevant for acetylene and for stamp marking as valid at the time of the initial inspection and tests.</i>  The Consultant follows this proposal and withdraws its related comment and proposal for amendment.
UK	European Annex – to be drafted	Marking requirements should be made more specific in a European annex of EN ISO 11372, by requiring compliance with EN ISO 13769.		Supported	This comment was withdrawn with the same justification as for the above comment.
UK	General	Apart from a different approach on marking, the comments of the CEN Consultant are supported.		./.	The WG supports that the findings of the Consultant are addressed adequately.

D	General	((Different comments were submitted with respect to the assessment by the consultant, the correct allocation of RID/ADR provisions and clauses of the standard, in particular. However, no comment questions the reference to this standard, as proposed in the assessment.))		./.	Not discussed in detail, because these comments are not relevant for the acceptance of the standard for reference in RID/ADR.
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**B. Standards at Stage 3: Submitted for Formal vote**

Dispatched by CEN on 3.6.2010

<b>FprEN ISO DIS 13341</b>	<b>Transportable gas cylinders – Fitting of valves to gas cylinders</b>		<b>Where to refer in RID/ADR/ADN: No reference recommended</b>	<b>Applicable sub-sections and paragraphs: None</b>	
<p>Assessed by CEN consultant on 27.5.2010</p> <p>Summary of conclusions:</p> <p><i>FprEN ISO 13341 can be approved. A few editorial improvements are recommended.</i></p> <p><i>It is not considered to be a candidate for reference in RID/ADR/ADN.</i></p> <p><i>There is seen no need to have European modifications.</i></p> <p>Proposed follow-up action:</p> <p><i>No action required, as this standard is no candidate for reference in RID/ADR/ADN.</i></p>					
<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		Agree that this standard is not a candidate for referencing in the regulations.		./.	It is confirmed that this standard is not a candidate to be referenced in RID/ADR.
<b>Decision of the STD's WG:</b>	<del>Aceepcted</del> <del>Refused</del> <del>Postponed</del>	Comments No decision taken as the standard is not recommended to be referenced			

Dispatched by CEN on 25.7.2010

<b>FprEN 14638-3</b>	<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>		<b>Where to refer in RID/ADR/ADN: 6.2.4.1</b>	<b>Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4</b>	
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Assessment of first final draft by CEN consultant on 6.6.2010

Summary of conclusions:

*There are no non-compliances between FprEN 14638-3 and RID/ADR/ADN 2009, as amended and to become effective by 1.1.2011.*

*Comments by the Standards Working Group and of my assessment of the second enquiry draft text of the standard - both considered as of editorial nature - have now – with the second Final draft text - been addressed adequately.*

*One additional major editorial deficiency was detected which need to be corrected prior to printing (see Annex to this assessment).*

*EN 14638-3 is proposed for reference in RID/ADR 6.2.4.1, Table, under “for design and construction related to subsections 6.2.3.1 and 6.2.3.4.*

Proposed follow-up action:

*This standard needs to be discussed by the STD’s WG for reference in RID/ADR 6.2.4.1, Table, under “for design and construction” and related to subsections 6.2.3.1 and 6.2.3.4.*

**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	5.1	The sentence “It is recommended that an approximate calculation for the initial design is made.” appears to conflict with RID/ADR “6.2.3.1.2 Whenever possible the wall thickness shall be determined by calculation, accompanied, if needed, by experimental stress analysis.” Making the calculation only a recommendation seems not to meet the test of ‘whenever possible’.		Alignment with regulations supported	The WG confirms that the wording of 5.1, second sentence needs to be aligned with the text of RID/ADR 6.2.3.1.2 to read: <i>Whenever possible, an approximate calculation for the initial design is made.</i>
UK	9	In the penultimate sentence the reference to EN 14638-3 is incorrect.		To be corrected before publication or by a corrigendum	It is confirmed that <i>EN ISO 13769</i> is the correct reference.
UK	3	EN ISO 13769 is missing from the normative references		To be corrected before publication or by a corrigendum	Confirmed.
UK	General	This standard is suitable for referencing in the RID/ADR as proposed by the CEN Consultant and with attention to his recommendations.		./.	The WG supports that the findings of the Consultant are addressed adequately.
CH	6.7.2.4/ Annex A and 8.1.2.6	There seems to be a non-consistency between the two clauses with respect to the alternative performance of a burst test.		To be checked prior to publication.	The WG supports a clarification or a confirmation.
<b>Decision of the STD’s WG:</b>	<b>Accepted Refused Postponed</b>	Comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
				Until further notice	-

Dispatched by CEN on 25.7.2010

prEN 14894:2010		LPG equipment and accessories – Cylinder and drum marking		Where to refer in RID/ADR/ADN: No direct reference recommended	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4	
Assessed by CEN consultant on 7.7.2010						
Summary of conclusions: <i>The text of this standard conforms to the provisions of RID/ADR as valid from 1.1.2011. It can be approved.</i> <i>A number of improvements are required prior to publication – see clause 5 and the Annex to this assessment, using the CEN electronic balloting commenting template.</i>						
Proposed follow-up action: <i>This standard needs to be discussed by the STD's WG as a normative reference for standards on the design of cylinders and drums for the transport of LPG.</i>						
<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	8	This is a European standard, so all new cylinders in the EEA (i.e. all countries publishing CEN standards) will be required to carry the TPED Conformity ( $\pi$ ) mark. This is a certification mark and in our opinion should appear as the first item in table 3, as shown in TC 23's standard EN ISO 13769.		Transfer the TPED conformity mark entry to the first line of table 3 clause 7 so that the $\pi$ mark appears in the place of the UN mark	Supported.	It was agreed that the $\pi$ - mark should be kept in Table 4. However, it should be required that the $\pi$ - mark is grouped together with the certification marks (before or after).
UK	General	Comments of the CEN Consultant supported, particularly the mention of grouping the marks on three lines – top, middle and bottom. This standard should not be referenced in RID/ADR.			./.	The Group underlines the need to address the grouping of the marking elements again to align it further with the regulations and is aware that this may lead to changes of the marking practise.
CH	8	Comment to the CEN consultant: In our opinion it is correct to give the whole sample of the marking for the last periodic inspection, But we would prefer to changes the text in column 2 t. "marking of the last periodic inspection"			./.	The Group supports this proposal which will render the Consultants comment as irrelevant.
CH	Table 4, line 5	It is recommended any marking on heat treatment should be located beneath the marking for the design standard.			No objections	Supported.
<b>Decision of the STD's WG:</b>	<b>Accepted</b>	Comments Accepted as normative reference in LPG cylinder design standards, only.		Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
	<b>Refused</b> <b>Postponed</b>			Not relevant		