

## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

02 September 2014

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

Geneva, 15-19 September 2014

Item 5 (a) of the provisional agenda

#### Proposals for amendments to RID/ADR/ADN: pending issues

### **Comments on document 2014/48: Periodic inspection and test of some transportable refillable LPG steel cylinders in RID/ADR**

#### **Transmitted by the Government of Sweden**

#### **Introduction**

1. The proposal to include the protected over-moulded cylinders into RID/ADR have been discussed during the last four sessions of the Joint meeting. However, there are still some matters that need to be clarified.

#### **General comments**

2. In paragraph 19 of document 2014/48, in the new special provision 6XY, AEGPL states that *“The following procedures shall replace the requirements of 6.2.1.6 a) and d).”*

The third section of paragraph 19 states: *“Notwithstanding P200 periodic inspection shall be performed by sampling of an annual production group of cylinders after 3 years in service and thereafter every 5 years.”*

The last sentence in paragraph 19 states that *“All other provisions of RID/ADR shall apply”*.

This would mean that AEGPL do not exclude the internal inspection required in 6.2.1.6 b) and not the checking of the threads required in 6.2.1.6 c) in their proposal, but the requirements in 6.2.1.6 b) and c) should only apply to the selected samples of the annual production group.

3. In the new special provision 6XY, AEGPL is referring to EN 1439:2008 for prefill inspection. Paragraph 4.3 of EN 1439:2008 reads:

*“4.3 Cylinders for periodic inspection*

*A cylinder shall be set aside for periodic inspection in accordance with EN 1440 when either of the following conditions apply:*

- a) cylinder is out of test date;*
- b) cylinder cannot be confirmed to be within test date.”*

Furthermore, Annex G of EN 1439:2008 reads:

*“G.2 Cylinders suitable for filling*

*The age of the protected cylinder shall be less than the periodic inspection interval for this design of cylinder or the protected cylinder shall be from a batch that has been tested in accordance with EN 1440 (batch testing).*

*G.3 Cylinders for periodic inspection*

*The selection of protected cylinders for periodic inspection shall be done by sampling in accordance with EN 1440.”*

(In EN 1439, the reference to EN 1440 should be EN 16728, see paragraph 3.2 of INF.21Rev.1 from the March session 2014)

4. EN 16728 and Table 1 are referring to Annex F for the procedures for periodic inspection of over-moulded cylinders. Annex F is describing the periodic destructive tests on batch sampling, without mentioning the internal inspection and checking of threads required in 6.2.1.6 b) and c).

5. This seems to be inconsistent and our concern is that the new text does not express clearly enough that the requirements in 6.2.1.6 b) and c) still apply to the cylinders selected from the annual production group. Therefore, there is a risk that these procedures might not be performed. Consequently, the Swedish view is that this needs to be clarified in the proposed new special provision.

6. Nevertheless, the cylinder design does not prevent internal inspection to be carried out and Sweden can see no reason for excluding this requirement for the rest of the cylinders, other than the selected samples. These cylinders are consumer products and no one could ever know under which conditions they have been used and handled. There have been incidents in Sweden caused by users who have filled cylinders with a substance for which they have not been designed, leading to damages on the inner wall of the cylinders. Sweden believes that accidents caused by improper handling of a cylinder may be prevented if 100 % of all kinds of cylinders are subject for internal inspection. So consequently, from a safety point of view, internal inspection only on a sample from an annual production group is not acceptable for Sweden.

7. In paragraph 2 of document 2014/48, AEGPL refers to the autumn 2013 Joint Meeting report (ECE/TRANS/WP.15/AC.1/132, para 66) saying that the Joint Meeting had no objection in principle to the proposed texts. However, the same paragraph continues with saying that the remaining issues should be solved through the work of an informal working group.

8. In the next paragraph (ECE/TRANS/WP.15/AC.1/132, para 67) it is proposed by the expert from Germany that the informal working group should be of the same kind as the one that was set up to discuss test periods and that it should thus meet several times so as to be able to study the implications of the proposed new approach.

9. As a reaction to that, several delegations expressed the wish that a solution should be found during coming sessions so that the relevant texts would enter into force at the latest on 1 January 2017 (ECE/TRANS/WP.15/AC.1/132, para 68). The Swedish view is that rushing into a decision on this matter at this session seems to be rash and would also be a very contradictory approach to what was stated in the report from the autumn 2013 session.

10. Sweden would also like to express support to the concerns presented by the government of Spain in informal document INF.19. Our view is, like Spain, that the proposed method with sampling of annual batches and destructive tests on a very small

number of cylinders cannot guarantee the safety for each and every cylinder that is circulating on the market.

11. Furthermore, Sweden considers, like Spain, that the procedure proposed in document 2014/48 will give clear economic benefits for a specific kind of cylinder. In the long term, if the proposal is accepted as it stands; it will indicate that if a receptacle is designed with an attribute not allowing the receptacle to be inspected in accordance with the requirements of 6.2.1.6, you do not need to inspect 100 % of the receptacles if you apply a method of sampling testing. Therefore, if the proposal is accepted, Sweden believes it might be the beginning of the end for the general principle of periodic inspection on 100 % of the gas cylinders covered by RID and ADR.

## **Conclusion**

12. Since the proposed text may not enter into force before the 1<sup>st</sup> of January 2017, Sweden believes it would be inappropriate to rush to a decision at this meeting. Sweden also considers that the remaining questions should be dealt with in an informal working group as stated in the above mentioned report from the autumn 2013 session. Furthermore, a specific kind of gas cylinder should not be given economic benefits because its design makes it impossible to fulfil the regulations on periodic inspection. The design of the cylinder has no impact on the possibility to perform internal inspection in accordance with 6.2.1.6 b), so Sweden can see no reason to exclude that requirement. Finally, the Swedish view is that internal inspection should be executed on 100 % of the cylinders, and Sweden can therefore not accept the proposal in document 2014/48.

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