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RID/ADR/ADN

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods (Geneva, 15 - 25 September 2015)

Item 3 (b) of the agenda: Proposals for amendments to RID/ADR/ADN – new proposals

Amendment to paragraph 6.2.6.1.5 (Document ECE/TRANS/WP.15/AC.1/2015/49 submitted by ECMA)

Comments by Germany

Introduction

1. At its spring 2015 session, the Joint Meeting decided to adopt Proposal 5 of the Working Group on Standards. This proposal was to add EN 16509, excluding Clause 9, as a reference in 6.2.6.4 of RID/ADR. ECMA proposes that the whole of Clause 9 of EN 16509 – Marking – should not be excluded simply because only one particular mark is missing.
2. Instead of completely excluding Clause 9 of EN 16509, which refers to marking, ECMA proposes to only demand that a gas cartridge in accordance with paragraph 1.8.8.4.1 (e) of RID/ADR be additionally durably and legibly marked with the water capacity of the gas cartridge.
3. Germany objects to the argument put forward by ECMA that the marking of the name of the gas, quantity and pressure of the gas as well as the capacity was sufficient to clearly identify the gas cartridge type. For this reason, even if the proposal regarding the marking of the water capacity was adopted, it would additionally be necessary to affix the mark identifying the type of gas cartridge as required in accordance with paragraph 1.8.8.4.1 (e) of RID/ADR.

4. ECMA proposes in the same document that the standards referenced in sub-section 6.2.6.4 of RID/ADR be treated in the same way as the standards referenced in sub-sections 6.2.2.1 and 6.2.4.1 of RID/ADR so that they have to be applied mandatorily.
5. Germany welcomes the amendment proposed by ECMA. As a consequence, however, Germany considers it necessary to also regulate the cases where no standard is available, at least with regard to small receptacles containing gas. Simply falling back on the basic requirements in section 6.2.6 of RID/ADR cannot be the alternative to the mandatory application of standards for small receptacles containing gas with a test pressure not exceeding 450 bar. Currently, no standards are referenced for small receptacles containing gas of a capacity exceeding 120 ml. Germany proposes a procedure comparable to section 6.2.5 of RID/ADR of using and recognizing a national code with the aim of harmonization as standard in the medium term.

Proposal 1

6. Germany proposes to modify proposal 1 by ECMA in document OTIF/RID/RC/2015/49 (ECE/TRANS/WP.15/AC.1/2015/49) as follows (new text is underlined and in bold, text to be deleted is crossed out and in bold):

"– for UN No. 2037, small receptacles containing gas (gas cartridges) containing non-toxic, non-flammable compressed or liquefied gases: EN 16509:2014 Transportable gas cylinders – Non-refillable, small transportable, steel cylinders of capacities up to and including 120 ml containing compressed or liquefied gases (compact cylinders) – Design, construction, filling and testing, ~~excluding clause 9.~~ In addition to the marks required in Clause 9.2.1 of EN 16509, the water capacity (in litres) of the compact cylinder and the approval mark in accordance with 1.8.8.4.1 (e) shall be marked on the cylinder ~~to clearly identify the Type.~~"

Proposal 2

7. In addition to proposal 2 by ECMA in document ECE/TRANS/WP.15/AC.1/2015/49, Germany proposes to add the following sentence at the end of sub-section 6.2.6.4:

"Where none of the above standards can be applied, a code recognized similarly to section 6.2.5 shall be used for conformity assessment. The provisions of section 6.2.6 shall be met."
