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

Bern, 14–18 March 2016

Item 2 of the provisional agenda

Tanks

Tanks: informal working group on the inspection and certification of tanks

Transmitted by the Government of the United Kingdom^{1, 2}

Summary

1. The informal working group on the inspection and certification of tanks met for a second time in London, 12 to 14 October 2015 under the chairmanship of Mr. J. Mairs (United Kingdom). Representatives of Belgium, Finland, France, Germany, the Netherlands, Norway, Poland, the Republic of Ireland, Sweden, Switzerland, the United Kingdom, CLCCR, IDGCA, ITCO, and UIP participated.

Appointment, control and monitoring of inspection bodies, including mutual recognition

2. The group continued the work previously reported to the autumn session in informal document INF.10. It began by tabling the draft Assessment Framework for Recognised Bodies for the Transport of Dangerous Goods dated 20 July 2015, submitted by the Netherlands. The Framework covers the procedures for applying for recognition from the Government of the Netherlands and for its supervision of recognised bodies. The Framework includes a table which classifies failure to comply with the organisational and

¹ In accordance with the draft programme of work of the Inland Transport Committee for 2016-2017, (ECE/TRANS/WP.15/2015/19 (9.2)).

² Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2016/13.

the substantive requirements applicable to recognised bodies as “level 1” shortcomings, and more serious non-compliances as “level 2” shortcomings. In another appendix the Framework lists the questions asked during audit, including examples of documents that constitute proof of compliance.

3. The group agreed that upon publication this would be another useful example showing how a Contracting State/Contracting Party implements these responsibilities, complementing those published and previously tabled by the Vehicle Certification Agency of the United Kingdom.

4. Proposals for amending RID/ADR/ADN to achieve greater harmonisation of inspection and approval procedures for tanks for substances of classes 3 to 9 with tanks for substances of Class 2 were tabled by Germany and the UIP. These amendments have a bearing on Chapters 1.8, 4.3, and 6.8. In the time available the group was unable to agree to these comprehensive proposals but it did appreciate the work done in indicating the changes that would be needed to achieve greater harmonisation and move towards mutual recognition.

5. Next, the group discussed a draft questionnaire for obtaining information on what is known by competent authorities of the activities of appointed inspection bodies within participating countries. Following a discussion of each question, the United Kingdom agreed to amend the questionnaire and circulate it to the group for completion in advance of its next meeting. The United Kingdom will analyse the returns for discussion at the next meeting. Further improvements may be needed before seeking the agreement of the Joint Meeting for the questionnaire to be distributed to all Contracting States and Parties.

Clarification of inspection requirements

6. The United Kingdom’s proposal that inspection bodies should remind owners and operators of their responsibility to maintain proper tank records met resistance among the group. Some saw this as being a role for safety advisers and suggested that any deficiencies should be addressed through national measures imposing penalties for such failings.

7. **In light of recently developed remote inspection techniques, the Joint Meeting is asked to offer its opinion on whether the RID/ADR/ADN requirements for internal inspection mean that a person must enter the tank or whether such techniques can be used if approved by the competent authority.** Discussion was divided between those needing to know more about the effectiveness of such techniques; those considering that the technology is well established in other fields of inspection; and those who felt that it was appropriate where man-access to the tank or compartment is restricted for reasons of access or safety. If the Joint Meeting decides that the concept of remote inspection methods may be applied to internal inspections, then the technical standards for tank inspections will need to reflect this with reference to any standards applying to other industry sectors.

8. The United Kingdom gave a short update on the ongoing work concerning exceptional checks after repairs or alterations to tanks or their service equipment. There were no proposals to amend RID/ADR/ADN ready for consideration at this stage.

Improvements to construction and inspection requirements

9. The group discussed the non-destructive testing requirements for welds and agreed to search for standards applying to other methods, such as the eddy current technique, that could justify their inclusion within RID/ADR/ADN.

10. A discussion centred on paragraph 6.8.2.1.23, highlighting the importance of targeted non-destructive testing in the certification of tanks. The United Kingdom noted that under the current provisions the three different types of weld – longitudinal, circumferential and radial – may not be tested in locations subject to high stresses and strains under impact or in-service conditions. The group was not immediately persuaded to make amendments for more targeted inspections. However, the United Kingdom said it would marshal its arguments for further consideration at the next meeting.

11. The group was given a presentation by TWI (previously known as the welding institute) of some of the recent United Kingdom research on petroleum road fuel tankers that could lead to an effective means of assessing the designs of tanker end dish to shell joints which do not conform to those depicted in the informative annex in the standard for the design and construction of low pressure tanks (EN 13094). Meanwhile it was agreed that it should be made clear that one of the designs in the standard should cease being used for dish ends. Members of CEN/TC 296 present at the meeting indicated that this and the findings of the United Kingdom research would be put to the working group responsible for EN 13094.

Customer experience of using the database for issuing in the United Kingdom inspection certificates

12. Lloyds Register, the largest customer of the database, hosted a session of the group in its historic building in the City of London. The database gives the United Kingdom greater oversight of the activities of its inspection bodies. Lloyds Register was able to describe how it is able to work effectively with the database and expressed its opinion that a harmonised approach across contracting states and parties would be a welcome development.

Next meeting

13. The group agreed to meet again in London, 11 to 13 January 2016.
