

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

13 September 2016

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

Geneva, 19–23 September 2016

Item 4 of the provisional agenda

Interpretation of RID/ADR/ADN

Interpretation of transition provisions 1.6.2.13 and 1.6.2.15

Transmitted by the European Industrial Gases Association (EIGA)

Introduction

1. The marking provisions for bundles of cylinders were revised in the 2015 edition of RID/ADR and transitional measures 1.6.2.13 and 1.6.2.15 were agreed to allow the marking of bundles of cylinders to be brought into conformity at their next periodic inspection.
2. The text of these two provisions are as follows:
 - 1.6.2.13 Bundles of cylinders manufactured before 1 July 2013 which are not marked in accordance with 6.2.3.9.7.2 and 6.2.3.9.7.3 applicable from 1 January 2013 or 6.2.3.9.7.2 applicable from 1 January 2015 may be used until the next periodic inspection after 1 July 2015.
 - 1.6.2.15 Bundles of cylinders periodically inspected before 1 July 2015 which are not marked in accordance with 6.2.3.9.7.3 applicable from 1 January 2015 may be used until the next periodic inspection after 1 July 2015.
3. The text of 1.6.2.13 as proposed for the Joint Meeting of March 2013 was deemed unsatisfactory and it was amended in the plenary meeting by verbal proposals through the microphone. 1.6.2.13 was amended and a new provision 1.6.2.15 was proposed at the March 2014 Joint Meeting and followed the pattern of the text agreed a year earlier. Recent experience has shown that the intention of these measures is not clear.
4. These transition measures do not give explicit instruction as to what should happen at the next periodic inspection and this is leading to discussions and disagreements between operators and inspection bodies. These measures have been interpreted as meaning that the affected bundles of cylinders shall be withdrawn from service at the time of the next periodic inspection.
5. The Joint Meeting is asked to confirm that the intention of these measures was for the bundles of cylinders to remain in service indefinitely, provided the marks were brought into conformity with the regulations at the first periodic inspection.

Proposal

6. If the Joint Meeting agrees that the intentions of these transition measures are not clear, EIGA proposes they should be amended and suggests the following texts (new text underlined).

1.6.2.13 Bundles of cylinders manufactured before 1 July 2013 which are not marked in accordance with 6.2.3.9.7.2 and 6.2.3.9.7.3 applicable from 1 January 2013 or 6.2.3.9.7.2 applicable from 1 January 2015 may be used ~~until~~ provided they are marked in accordance with 6.2.3.9.7.2 applicable from 1 January 2015 at the next periodic inspection after 1 July 2015.

1.6.2.15 Bundles of cylinders periodically inspected before 1 July 2015 which are not marked in accordance with 6.2.3.9.7.3 applicable from 1 January 2015 may be used ~~until~~ provided they are marked in accordance with 6.2.3.9.7.3 at the next periodic inspection after 1 July 2015.
