

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**

18 September 2017

Geneva, 19–29 September 2017

Item 2 of the provisional agenda

Tanks

Comments on documents ECE/TRANS/WP.15/AC.1/2017/38 and informal document INF.10

Transmitted by the International Union of Wagon Keepers (UIP)

Description of current situation

1. As freight transportation on rail – supported by several Railway Packages of the European Union – is very much a European business, UIP supports the approach of harmonizing inspection and approval procedures on European level. Even more driven by the 4th Railway Package – already decided by EU for 2019 – a European approach for approval and inspection is required to support European use of freight wagons.

2. But especially this leads to some remarks to be made regarding the current draft of proposed changes to ADR/RID.

3. In Chapter 6.8 of RID already for years requirements for inspection bodies and their nomination to OTIF to allow inspection of tanks in the country of use, when this inspection is due. Such ideas have been discussed in the UK group and are softly described in Annex I of supplementary information (INF.10) but missing in proposed changes to ADR/RID.

4. The idea to implement a new type of inspection (entry into service inspection according to 6.8.1.5.5) must be questioned from RID perspective at least regarding implementation of such procedures between European member states in European Rail Sector. Even today such a tank-wagon gets an individual number (today of the registering country) that is in no way linked to the country of use and cannot even be changed. After 2019 ERA will be responsible for that procedure of putting into service on European territory. Such national ideas of creating additional inspections in case of changes of registration do not fit – a system of mutual acceptance at least in European sector is needed as already explained above.

5. More concrete we would like to address our concerns regarding the proposed change in 1.8.7 to link all approvals to the manufacturer and delete the applicant here. Such wagons with their tanks are used under TSI and maintained by ECM. Their useful life cycle is much longer than the life cycle of such tanks on road. Lots of keepers/ECMs prefer to be owner of their tank approvals. This is not possible under this proposed text that only knows the tank manufacturer.

6. The proposed change regarding welding (6.8.2.1.23) is necessary. UIP made a proposal for the last Joint Meeting (ECE/TRANS/WP.15/AC.1/17/BE/INF.6e).

7. The text proposed in informal document INF.10 goes into the correct direction but it does not solve the open question of who shall be responsible for this requirement.
8. The current proposal opens the door for different national regulations. We would like to come back to the UIP proposal:
 - new builds to be linked to the inspection body for type approval
 - repair to be linked to the inspection body that carries out the inspection after repair.

Conclusion

9. In UIP view the direction of harmonized procedures is welcome and supported.
 10. In RID due to open European Railway some changes or additional work in RID will become necessary and should either to be implemented in future work of that group or must be considered when to be implemented in RID.
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