

Comments on document ECE/TRANS/WP.29/GRSG/2017/10

The text reproduced below was prepared by the European Association AEGPL to comment on document ECE/TRANS/WP.29/GRSG/2017/10 submitted by the expert from Poland.

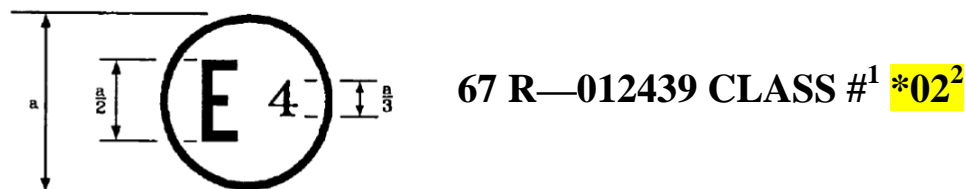
A. Proposal

Annex 2A, amend to read:

“Annex 2A

Arrangement of the LPG equipment type approval mark

(See paragraph 5.4. of this Regulation)



$a \geq 5 \text{ mm}$

¹ Class 0, 1, 2, 2A or 3

² Number of extension, to be marked only on multivalve, pressure relief valve (discharge valve) and pressure relief device.

The above approval mark affixed to the LPG equipment shows that this equipment has been approved in the Netherlands (E 4), pursuant to Regulation No. 67 under approval number 012439. The first two digits of the approval number indicate that the approval was granted in accordance with the requirements of Regulation No. 67 as amended by the 01 series of amendments. The number of extension (02 in the example), preceded by the star symbol, is required only for the approval mark of the accessories of the container (multivalve, pressure relief valve (discharge valve) and pressure relief device).”

B. Justification

The document ECE/TRANS/WP.29/GRSG/2017/10 concerns the LPG tank and its accessories as approved according to UN Regulation No. 67.

The Regulation requires a specific test (bonfire) of the container equipped with a specific configuration of accessories (combined in a multivalve or separated).

For each container, a list of the possible configurations of accessories fitted to the container is approved and communicated by means of the table 3 of the Annex 2B-Appendix to the Regulation (see par. 3).

This list comprises also the extension number of each accessory.

As correctly highlighted in the justifications attached to the document ECE/TRANS/WP.29/GRSG/2017/10 (see point 8): *“the manufacturer (of the accessory) is obliged to mark the product with the type approval number, but is not obligated to mark it with the number of extension (Regulation No. 67, para 4.1). This means that holding in the hand a component approved according to Regulation No. 67 you cannot be sure of the actual extension of approval.”* and so you do not know whether this accessory is approved to be fitted to a specific container.

In order to solve this issue, as correctly raised by the Polish experts, AEGPL proposes to mark the extension number on the accessories relevant to the bonfire test (multivalve, pressure relief valve and pressure relief device) so that the fitting of any accessory not listed in the aforesaid list of approved configurations will be prevented/forbidden.

As alternative to the proposal contained in the document ECE/TRANS/WP.29/GRSG/2017/10, the present solution would imply a new requirement in the marking of the accessories fitted to the containers but it would avoid an overload of paperwork and a proliferation of accessories' type approval numbers.
