

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

21 February 2020

Bern, 16–20 March 2020

Item 2 of the provisional agenda:

Tanks

Comments on the informal working group on the inspection and certification of tanks: Proposed amendments to Chapter 6.8 and to Sections 1.8.7 and 1.8.6

Transmitted by the European Industrial Gases Association (EIGA)

Introduction

1. Referring to item 6 of ECE/TRANS/WP.15/AC.1/2019/GE/INF.45 (Report of the eleventh session of the informal working group on the inspection and certification of tanks), ECE/TRANS/WP.15/AC.1/2019/GE/INF.16 from Germany and ECE/TRANS/WP.15/AC.1/2019/GE/INF.45 from United Kingdom.
2. EIGA has submitted a few comments by mail on October 29th, 2019 to the Chair of the London Group for discussion at the London meeting in December 2019. Due to lack of time, these comments were not discussed during this meeting and EIGA is submitting them again for discussion at the Bern meeting March 2020.
3. In ECE/TRANS/WP.15/AC.1/2019/GE/INF.19/Rev.1, a new provision (in blue) has been added in 1.8.7.7.1 (b) (ii): Affix the [registered] identity mark of the inspection body, and the mark of the in-house inspection service where appropriate on the product to ensure traceability.

Proposal

4. Referring to ECE/TRANS/WP.15/AC.1/2019/GE/INF.19/Rev.1, EIGA considers that this new mark of the in-house inspection service does not bring added value in terms of traceability and may be a source of confusion. EIGA proposes to remove this new mark of the in-house inspection service.

Justification

5. This new mark of the in-house inspection service is not required for the following reasons:

- The traceability of the periodic inspections is already addressed in 1.8.7.6 since the "reports of periodic inspections and tests of pressure receptacles shall be retained by the owner or operator at least until the next periodic inspection" and in 1.8.7.7.1 where it is requested to "affix the identity mark of the inspection body".

In addition, audits prescribed in 1.8.7.7.4 ensure "that the applicant in-house inspection service maintains and applies the quality system", concerning in particular the reports of periodic inspections.

- There is no provision in ADR concerning this new mark. Consequently, there may be a risk of confusion between the regulatory marking (6.2.2.7 and 6.2.3.9) and this new one.
 - EIGA is not aware that the lack of marking of an in-house inspection service has ever caused confusion or doubts of the legitimacy of the performed inspection. If the proper documentation cannot be provided, then the inspection is not valid, and an additional mark may even have a contrary effect, as it would then indicate a legitimate inspection without having the proper documentation.
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