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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**

Bern, 10-11 September 2020 and Geneva, 14-18 September

Item 2 of the provisional agenda

Tanks**Comment on document ECE/TRANS/WP.15/AC.1/2020/20:
Supplementary information from 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 Government of the United Kingdom^{*, **}***Summary*

Executive summary: The proposed amendments to RID/ADR/ADN in so far as the accreditation of inspection bodies is concerned are envisaged by Ireland and possibly other Contracting Parties/Contracting States to have a significant detrimental impact on the petroleum sector. Equally the current proposals are considered by the majority of the informal working group to be important if reciprocal arrangements for the inspection and certification of tanks are to be achieved. In such circumstances the United Kingdom is of the view that for certain types of inspections it would be appropriate for a competent authority to decide on the accreditation required.

Action to be taken: Amend RID/ADR/ADN 1.8.6.2.1.

Related documents: ECE/TRANS/WP.15/AC.1/2020/19,
ECE/TRANS/WP.15/AC.1/2020/20 and
ECE/TRANS/WP.15/AC.1/2020/47.

* 2020 (A/74/6 (Sect.20) and Supplementary, Subprogramme 2).

** Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2020/49.

Introduction

1. The United Kingdom notes document ECE/TRANS/WP.15/AC.1/2020/47 by Ireland, which expresses concerns over the proposals in sub-section 1.8.6.2.1 of document ECE/TRANS/WP.15/AC.1/2020/20 to allow only type A accredited inspection bodies to undertake inspections. These concerns were raised and noted during the thirteenth meeting of the informal working group on the inspection and certification of tanks, which took place in London from 11 to 13 December 2019, but were not addressed as it was thought best to do so at the Joint Meeting.
2. In the United Kingdom the good experience over many years with certain inspections undertaken by type C accredited inspection bodies is such that it would not be proportionate and impose unnecessary burdens if only type A accredited inspection bodies were required to undertake inspections such as those highlighted by Ireland. The view of the United Kingdom is therefore somewhat similar to that of Ireland in that provision should be made in RID/ADR/ADN to allow type C accredited inspection bodies to continue to perform periodic, intermediate and minor exceptional inspections (excluding major repairs and alterations) in accordance with RID/ADR/ADN 6.8.2.4.
3. However, given the majority view of the informal working group that only type A accredited inspection bodies should be approved for Chapter 6.8 inspections, it would be appropriate if competent authorities could be allowed to decide for themselves on the accreditation required for periodic, intermediate and minor exceptional inspections (excluding major repairs and alterations) rather than being mandated to accredit type C inspection bodies for such purposes as proposed by Ireland.

Proposal

4. Accordingly, it is proposed to amend the text provided in document ECE/TRANS/WP.15/AC.1/2020/20 as follows, with the new proposed text in bold.

"1.8.6.2.1 When the competent authority approves an inspection body, the approval scheme shall be based on EN ISO/IEC 17020:2012 (except clause 8.1.3) type A, ~~or type B when allowed in Chapter 6.2.~~

Except when 6.2.2.11, 6.2.3.6 and TA4 and TT9 of 6.8.4 apply, competent authorities may decide not to use accreditation according to EN ISO/IEC 17020:2012. In these circumstances 1.8.6.2.4 applies.

When the competent authority approves an approved body to perform periodic inspections of receptacles according to Chapter 6.2, this approved body shall be accredited according to EN ISO/IEC 17020:2012 (except clause 8.1.3) type B.

When the competent authority approves an approved body to perform periodic inspections, intermediate inspections and minor exceptional inspections (excluding major repairs or alterations) of tanks according to Chapter 6.8, this approved body may be accredited according to EN ISO/IEC 17020:2012 (except clause 8.1.3) type C.

When accreditation is used, it shall clearly cover the activities of the approval.

When the competent authority does not approve inspection bodies or approved bodies but performs these tasks itself, the competent authority shall meet the provisions of 1.8.6.3."

Justification

5. The United Kingdom is of the view, as with all inspections, that periodic, intermediate and minor exceptional inspections (excluding major repairs and alterations) must be proportionate and avoid unnecessary burdens. With this in mind, based on good experience over many years with certain inspections undertaken by type C accredited inspection bodies,

the United Kingdom have proposed that competent authorities may allow type C accredited inspection bodies to perform such inspections.
