

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

Geneva, 15-19 September 2008
Item 3 of the provisional agenda

STANDARDS

Information on work in progress in CEN

Transmitted by the European Committee for Standardisation (CEN)

1. With reference to the Document **ECE/TRANS/WP.15/AC.1/2008/16** where CEN listed all standards proposed for comments, the CEN consultant has received comments from Switzerland and UK, which are collated in the **Appendix** to this document. The related standards and assessments from the CEN consultant have been made available on the dedicated CEN website as notified by email and letter, dated .25 June 2008 (First dispatch).
2. The Appendix will be used by the members of Standards Working Group during their “off-sessions” meeting to elaborate proposals to the Joint Meeting. Subject to the agreement of the Plenary, it is intended to deal with the tasks of the Standards WG as follows:

Monday, 15 Sept	JM, morning session – Presentation of papers related to topic STANDARDS. Allocation of tasks to the Std’s WG. Lunch break session (13.30 – 14.30) – Roll-call of delegates; approval of agenda, related documents. – Discussion of standards related to CEN/TC 023 Afternoon session (17.30 – 18.30 c.t.) – Discussion of standards related to CEN/TC 023
Tuesday, 16 Sept	Lunch break session (13.30 – 14.30) – Discussion of standards related to CEN/TC 023 Afternoon session (17.30 – 18.30 c.t.) – Discussion of standards related to CEN/TC 261 and TC 268
Wednesday, 17 Sept.	Before JM morning session Distribution of draft WG report, Part TC 023 Coffee break in the morning – Discussion of draft WG report, Part TC 023 Lunch break session (13.30 – 14.30) – Discussion of standards related to CEN/TC 286 Afternoon session (17.30 – 18.30 c.t.) – Discussion of standards related to CEN/TC 286 – Discussion of standards related to CEN/TC 296
Thursday, 18 Sept.	Before JM morning session – Distribution of draft WG report, Parts TC 261, 268, 286 and 296. Coffee break in the morning – Discussion of draft WG report, Parts TC 262, 268, 286 and 296. Lunch break – Distribution of agreed WG report to JM delegates JM, afternoon session – Presentation of WG report to delegates

A. Standards at Stage 2: Submitted for Public Enquiry

Dispatch from CEN, dated 25 June 2008

prEN ISO 9809-1 Second enquiry	Gas cylinders - Refillable seamless steel gas cylinders - Design, construction and testing - Part 1: Quenched and tempered steel cylinders with tensile strength less than 1 100 MPa (ISO/DIS 9809-1:2008)	Where to refer in ADR/RID: 6.2.4	Applicable sub-sections and paragraphs: 6.2.3.1. and 6.2.3.4		
CEN consultants assessment dated 9.6.2008					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	2	In EN ISO 10289 the definition of working pressure conforms to the definition in RID/ADR 1.2.1	None: this answers the CEN consultant's query in his assessment of the normative references.	Thanks!	
UK	11.2.2	The volumetric expansion test allows some permanent expansion in contradiction of RID/ADR 6.2.3.4.1 (g)	Annex NA should forbid the use of the volumetric expansion test, or industry make a case to delete or amend RID/ADR 6.2.3.4.1 (g), or the reference in RID/ADR 6.2.4 exclude this clause.	Support expert discussion and clarification in RID/ADR	
CH	11.2.2	The volumetric expansion test is to be excluded from RID/ADR.		If this test is common practise, it should be included in RID/ADR after expert discussion.	
CH	13 and Annex NB	prEN ISO 13769 shall not be referenced.		See below	
CH	13	Why is there no reference to lower temperature as in prEN ISO 9809-3?		To be checked.	
UK	NA.1	EN ISO 11114-4 does forbid the use of Method C in the Annex NA	None: this answers the CEN Consultant's query.	Thanks!	
UK	NA2; 5 Note	The Directive 99/36/EC will be repealed in July 2011	Retain the note to cover the time until the Directive is repealed, but see our comment on Annex NB	No objection	
UK	NA2; 13	Marking shall be in accordance with the regulations. EN ISO 13769 should be an informative reference	Suggest "Marking shall be in accordance with the relevant regulations. EN ISO 13769 gives guidance on the application of these markings." Or follow the suggestion of the CEN Consultant.	Support in principle the repetition of marking provisions as long the precedence of RID/ADR and the risk of temporary inconsistencies is clearly indi-	

UK	Annex NB	This Annex is obsolescent and since it provides guidance on all modules, it conflicts with the note in NA2	Delete Annex NB	cated. Agree. However, the relevant new RID/ADR paragraphs could be reproduced in this Annex.	
CH	Annex NB	I do not see any advantage of the amendment to "5 Inspection and Testing" and the table in Annex NB as the descriptions of type approval and inspection bodies are part of RID/ADR 2009 and the TPED will be changed very soon. There should be a clear partition between legal and technical aspects		See above.	
UK	CEN Consultant's Assessment	The detailed comments appended to the assessment should be sent to the relevant TC for consideration, but the UK makes some general comments in the next column	1. In Part 5 "Competent authority of the country of manufacture" should be ". . . country of approval" since manufacture may be in another country. 2. Reference to EN ISO 17020 should be informative only since the ISO standard will be used in countries with differing criteria. Since we are dealing with the inspection of new cylinders only Type A is relevant.	Comments have been sent to ISO/TC 58/SC3/WG3 – CEN/TC 23/SC1/WG1 and will be dealt with on Oct. 9/10, 2008	

prEN ISO 9809-2 Second enquiry	Gas cylinders - Refillable seamless steel gas cylinders - Design, construction and testing - Part 2: Quenched and tempered steel cylinders with tensile strength greater than or equal to 1 100 MPa (ISO/DIS 9809-2:2008)	Where to refer in ADR/RID: 6.2.4	Applicable sub-sections and paragraphs: 6.2.3.1. and 6.2.3.4
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CEN consultants assessment dated 9.6.2008

Comments from members of the Joint Meeting:

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		Same comments as for EN ISO 9809-1			
CH		Same comments as for EN ISO 9809-1			

prEN ISO 9809-3 Second enquiry	Gas cylinders - Refillable seamless steel gas cylinders - Design, construction and testing - Part 3: Normalized steel cylinders (ISO/DIS 9809-3:2008)	Where to refer in ADR/RID: 6.2.4	Applicable sub-sections and paragraphs: 6.2.3.1. and 6.2.3.4
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CEN consultants assessment dated 9.6.2008

Comments from members of the Joint Meeting:

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		Same comments as for EN ISO 9809-1			
CH		Same comments as for EN ISO 9809-1 except comment on lower temperature limits.			

prEN 14638-3		Transportable gas cylinders - Refillable welded receptacles of a capacity not exceeding 150 litres - Part 3: Welded carbon steel cylinders made to a design justified by experimental methods	Where to refer in ADR/RID: 6.2.4	Applicable sub-sections and paragraphs: 6.2.3.1. and 6.2.3.4	
CEN consultants assessment dated 28.9.2007 on enquiry draft and 27.6.08 on 2 nd enquiry draft					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	2, A.3.6, B.2.4, Annex C	Reference to EN 25817 to be replaced by EN ISO 5817.		To be checked.	
UK	4.1.2	The term “bung” is not defined.	Define bung	Alternatively, a more common term (plug?) could be used.	
UK	5.2	The requirement in the note is normative.	Make the requirement part of the normative text.	Agree. If the text of the Note is a quotation then the source need to be added.	
UK	6.4.3	“The footring, if attached, shall be drained” has no meaning in strict English.	Suggest “The footring, if attached, shall have drainage”	Agree.	
UK	7	Agree CEN Consultant’s comments on headings of this section	May be even better to separate into “Batch tests” and “Tests on every cylinder” as per ISO 9809 series.	-	

CH	7.6.7.2 b)	There seems to be a discrepancy between the requirement in 7.6.7.2 b) "bursting test or NDT" and Annex A.2. In the Annex an X-ray has to be done anyway?		To be checked.	
CH	8	prEN ISO 13769 shall not be referenced.		Support in principle the repetition of marking provisions as long the precedence of RID/ADR and the risk of temporary inconsistencies is clearly indicated.	
UK		CEN Consultant's comments	"country of manufacture" should be "country of approval".	?; can't find term in my assessment	

prEN ISO 28622		Pressure relief valves for transportable refillable cylinders for liquefied petroleum gas (LPG) (ISO/DIS 28622:2008)	Where to refer in ADR/RID: 6.2.4	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.3	
CEN consultants assessment dated 23.6.08					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
CH	6.1.8	The term "permanent deformation pressure" is not specified in any standard. Test pressure would be a correct term.		Agree!	
UK	6.4.7 after the comma	"maximum operating pressure of the cylinder" is not defined in either this standard or in RID/ADR.	This requirement is not related to the design, testing and marking requirements of the PRV, but is related the PRV's use. Delete.	Don't agree with reasoning under "Proposed change". This clause seems to be a performance test requirement governing the re-closing after the release of overpressure.	
UK	7.5	Does "Each valve" mean every valve or all sample valves or each of three sample valves? Are these the valves used in 7.4?	Specify how many valves shall be tested and clarify whether they are new samples or others used previously.	Seems to be a language issue.	

UK	7.6 and 7.7	These tests state “Repeat the test for all three valves”. Are these the three valves used in 7.4? or three new valves?	Clarify the samples to be used	Seems to be a language issue.	
UK	8	The absence of a normative plan for production testing is a profound weakness	Make Annex D normative	Supported.	
CH	Annex C	Annex C should be mandatory for the minimum discharge capacity.		To be discussed.	
UK	Annex D, final sentence	“within 615% of the nominal set pressure.” must be wrong	Change to “within 15% of the nominal set pressure.”	To be corrected.	

B. Standards at Stage 3: Submitted for Formal Voting

Dispatch from CEN, dated 25 June 2008

prEN 12245	Transportable gas cylinders - Fully wrapped composite cylinders	Where to refer in ADR/RID: 6.2.4	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4		
CEN consultants assessment dated 20.6.2008					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	7	The CEN Consultant is proposing a new amendment on marking which overlaps with the Note at the end of Clause 7 requested at the last meeting of the Standards WG.	Replace the first two sentences of Clause 7 by the following. “Marking shall be in accordance with the ADR/RID regulations. EN ISO 13769 gives guidance on the application of these markings and the normative requirement for marking the design (/service) life. The following specific additional information shall be included on a permanent marking label which shall be separated by a space from the markings required by ADR/RID.” Delete the Note	Seems to be a misunderstanding. At this stage, editorial amendments are acceptable, only. Adding of a Note is considered to be editorial. The proposed text would be a real requirement, referring to European law which is not acceptable under CEN rules. The proposed Note is considered equivalent.	
Decision of the STD's WG:		Accepted <input type="checkbox"/> Refused <input type="checkbox"/>	Comments:		

prEN ISO 13769		Gas cylinders - Stamp marking (ISO 13769:2007)	Where to refer in ADR/RID: 6.2.4	Applicable sub-sections and paragraphs: 6.2.3.9	
CEN consultants assessment dated 22.5.2008					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	All	The UK is not in favour of including this standard in the regulations due to the creation of two descriptions of the same legal requirements which can lead to uncertainty of interpretation. Also, it creates a problem of maintaining synchronous change by CEN and UNECE/OCTI	This standard is helpful to practitioners to agree the marking position details and elements not in the regulations such as the expiry of time-limited composite cylinders. The Standards WG has previously declined to reference the LPG marking standard.		
CH	All	Die Norm ISO 13769 wurde schon 3einmal diskutiert. Diese Norm sollte nicht ins RID/ADR aufgenommen werden. Die Kennzeichnung ist in den Regelwerken ausführlich und abschließend beschrieben. Sie sollte deshalb bei allen Normen, in denen Sie erwähnt wird, ausgeschlossen werden resp. eine Note in der Norme eingefügt werden analog zu EN 12245 Artike 7. Zudem ist anzumerken, dass die UAP zu dieser Norm zurückgezogen wurde.	(ISO 13769 has already been discussed 3 times. It shouldn't be referenced in RID/ADR. Marking requirements are comprehensively and definitively covered by the provisions. It should be exempt from all referenced standards or a Note in accordance with the one in EN 12245, clause 7 be added. It is to be noted, that the UAP of the standard has been withdrawn.) (The Note reads: "NOTE The marking of cylinders is subject to the ADR/RID regulations. These require that additional marking shall not conflict with required marks. This is achieved if the additional marking is separated from the required marks by a space. ")	Support in principle the repetition of marking provisions as long the precedence of RID/ADR and the risk of temporary inconsistencies is clearly indicated. With respect to the 2 nd comment, it is to say that a new UAP will be launched shortly.	
Decision of the STD's WG:		Accepted <input type="checkbox"/>	Refused <input type="checkbox"/>	Comments:	

prEN 15507	Packaging - Transport packaging for dangerous goods - Comparative material testing of polyethylene grades	Where to refer in ADR/RID: 6.1.5.2.5 and 6.5.4.3.4	Applicable sub-sections and paragraphs: 6.1.5.2.5 and 6.5.4.3.4		
CEN consultants assessment dated 18.4.2008					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	All	We don't object in principle to quoting the standard and we do support it, but because it references other standards that are not referenced in ADR we think it is premature to quote this unless the others are referenced.			
Decision of the STD's WG:		Accepted <input type="checkbox"/> Refused <input type="checkbox"/>	Comments:		

prEN 1626	Cryogenic vessels - Valves for cryogenic service	Where to refer in ADR/RID: 6.2.4	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.3		
CEN consultants assessment dated 7.3.2008					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	All	This should remain as a supporting standard; it is a normative reference in EN 1251-2:2000. This standard relates to valves for non-transport applications also and it is a harmonised standard under the PED. .	Note: The valves used on a cryogenic receptacle or tank are recorded in the type approval, unlike gas cylinders. Assessment of the suitability of valves is part of the type approval process.	Nevertheless, Note 2 of the Scope says that "All safety valves covered in this standard correspond to category IV of PED and category III of TPED. Obviously, this suggests a use for transportable vessels.	
Decision of the STD's WG:		Accepted <input type="checkbox"/> Refused <input type="checkbox"/>	Comments:		

prEN 13648-1		Cryogenic vessels - Safety devices for protection against excessive pressure - Part 1: Safety valves for cryogenic service	Where to refer in ADR/RID: 6.2.4	Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.3	
CEN consultants assessment dated 7.3.2008 CH comment: Annex to assessment is missing.					
Comments from members of the Joint Meeting:					
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	All	This should remain as a supporting standard. This standard relates to valves for non-transport applications also and is a harmonised standard under the PED.		So far, there are no standards on closures for cryogenic vessels referred to under RID/ADR 6.2.2 and 6.2.4, nor are equipment clauses part of design and construction standards for cryogenic vessels.	
CH		The values for opening and closing of safety valves as given in RID/ ADR 2007/6.2.1.3.3.5.1 or RID/ADR 2009/6.2.1.3.6.5.1n should be part of such a standard. The minimum would be an indication, that such values are important.		To be discussed.	
Decision of the STD's WG:		Accepted <input type="checkbox"/> Refused <input type="checkbox"/>		Comments:	