

Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Dangerous Goods****21 September 2012****Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods**

Geneva, 17-21 September 2012

Item 3 of the provisional agenda

Standards**Agreed comments by Members of the Joint Meeting on draft
standards dispatched by CEN since the last session****Transmitted by the European Committee for Standardisation (CEN)**

1. Reference is made to document **ECE/TRANS/WP.15/AC.1/2012/26**, which informs about the progress made in the establishment of new and the revision of published EN and EN ISO standards referenced or intended to be referenced in the RID/ADR/ADN. It invites Members of the Joint meeting to comment on the compliance of draft standards at enquiry and formal vote stage with regulations of RID/ADR/ADN.
2. Since the last session of March 2012, fourteen draft standards at enquiry and formal vote stage and related assessments by the CEN consultant were made available on the dedicated CEN webpage. All standards have been dispatched in time (8 weeks before the meeting of the Working Group on Standards) as agreed in the revised cooperation procedures between Joint Meeting and CEN (TRANS-WP15-AC1-100a3e).
3. The agreed comments of the Working Group on Standards (Std's WG) on **INF.28** are compiled in this document. It needs to be considered by the relevant standardizing bodies for the further preparation of the standards as a condition for their adoption for reference in RID/ADR/ADN.
4. Proposals on the amendment of RID/ADR/ADN to become effective by 1.1.2013 are part of the separate meeting report of the Working Group on Standards (**INF.37**).

A. Standards at Step 2: Submitted for Public Enquiry

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| prEN ISO 11120.3 3 rd submission | Gas cylinders — Refillable seamless steel tubes of water capacity between 150 l and 3000 l — Design construction and testing | | Where to refer in RID/ADR: 6.2.4.1 | Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4 | |
| WI 023135 | | | | | |
| Dispatch 3 | | | | | |
| Assessment, dated 22.8.2012, Dispatch 4. Summary of conclusions: <i>There is no clause in prEN ISO/DIS 11120.3 complies with all relevant provisions of RID/ADR UN- and non-UN pressure receptacles. This third parallel enquiry draft text is supported to be promoted to the FV stage without amendment.</i> Proposed follow-up action: <i>This standard needs to be discussed by the STD's WG as an addition to the existing reference to EN ISO 11120:1999 in RID/ADR 6.2.4.1, Table, under "for design and construction" and related to subsections 6.2.3.1 and 6.2.3.4.</i> | | | | | |
| 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 | | Standard can be referenced. | | | Reference is supported. To be decided at FV stage. |

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| prEN ISO/DIS 10297 | Gas cylinders — Cylinder valves — Specification and type testing | | Where to refer in RID/ADR: 6.2.4.1 | Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.3 | |
| WI 023148 | | | | | |
| Dispatch 3 | | | | | |
| Assessment, dated 22.8.2012, Dispatch 4. Summary of conclusions: <i>Despite the large number of changes in the revised issue the draft prEN ISO 10297 is still compliant with the essential safety requirements of RID/ADR and is supported to be approved. This includes the normative references which have also be found compliant with RID/ADR. The marking Clause in the ISO text doesn't comply with the marking provisions of the TPED Directive. This should give reason to prepare an additional European requirement to become part of the ISO- text. The option of separate type approvals could also be introduced as European requirements.</i> Proposed follow-up action: <i>This standard needs to be discussed by the STD's WG as an amendment of the existing references to earlier versions of the standard in RID/ADR 6.2.4.1, Table, under "for closures", related to 6.2.3.1 and 6.2.3.3 as applicable subsections.</i> | | | | | |

| Comments from members of the Joint Meeting: | | | | | |
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| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CEN Consultant | Comment from WG Standards |
| UK1 | 5 | <i>Do not understand the CEN Consultant's comment no. 1 that separate type approval is not addressed. The whole of the standard is dedicated to type approval of a valve on its own. This is separate type approval.</i> | | Design and type testing is the main subject of the standard. "Approval/certification appears in the Note to G.1 only. | To be considered at TC level |
| UK2 | | <i>We do not think the safety benefits of the new standard are more than incremental and do not think existing type approvals should be withdrawn in two years as suggested in KW's assessment.</i> | | To be discussed at FV stage, the latest. | Will be decided when the FV draft is submitted. |
| UK3 | | <i>Agree this standard can be referenced</i> | | | Reference is supported. To be decided at FV stage. |

| prEN ISO 3807 incl. EA | Gas cylinders - Acetylene cylinders - Basic requirements and type testing (ISO/DIS 3807:2012) | Where to refer in RID/ADR: 6.2.4.1 | Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4 |
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| WI 023166 | | | |
| Dispatch 1 | | | |
| <p>Assessment, dated 23.7.2012, Dispatch 4.</p> <p>Summary of conclusions:</p> <p><i>General UN/RID/ADR requirements on the compatibility of the cylinder and porous mass and solvent and the uniform distribution of the porous mass are not addressed in the standard. ISO 3807 doesn't include also requirements on the initial inspection and test of the cylinders after filling with porous mass and solvent. However, there is no conflict with the UN/RID/ADR provisions. The standard is can be promoted to the FV stage.</i></p> <p><i>It is noted that RID/ADR mention several times an "approval" in 4.1.4.1, P200 p) but fail to require such an approval in its provisions on acetylene cylinders.</i></p> <p>Proposed follow-up action:</p> <p><i>This standard needs to be discussed by the STD's WG as an addition to the existing reference to EN 1800:1998+AC:1999 and EN 1800:2006 in RID/ADR 6.2.4.1, Table, under "for design and construction" and related to subsections 6.2.1.1.9.</i></p> <p><i>It is expected that a decision is taken by the UN Subcommittee of Experts on the transport of Dangerous Goods (UN SCoE TDG) to update the existing references to ISO 3807-1 and ISO 3807-2 in the UN Model Regulations, 4.1.4.1, P200 p) and 6.2.2.1.3.</i></p> | | | |

The Joint Meeting may be advised that RID/ADR are inconsistent and incomplete with respect to the type testing and approval of acetylene cylinders including porous mass and solvent. Reference is made to an earlier application with the UN SCoE TDG: ST/SG/AC.10/C.3/2010/65.

Comments from members of the Joint Meeting:

| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CEN Consultant | Comment from WG Standards |
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| UK1 | | <i>We support the CEN Consultant's observation that the compatibility issues are not addressed.</i> | <i>Mention the required compatibilities in clause 4.</i> | | To be considered at TC level |
| UK2 | | <i>We do not agree with the CEN Consultant's observation that the initial inspection and test is not included in the standard. Clause 6 and Annex I give the state of the art in ensuring conformity of the porous mass with RID/ADR 6.2.1.5.1 (j)</i> | <i>None</i> | RID/ADR 6.2.1.5.1 (j) use the term "shall be inspected..." which usually means external control. Clause 6 and Annex I describe actions by the manufacturer. | It was been shown that the standard covers all aspects to be monitored and controlled in context with the filling of the cylinders with the porous mass. The Consultant withdraws his comment. |
| UK3 | | <i>When referenced, the option of fitting a fusible plug shall be forbidden. Tests and experience have shown that fusible plugs do not enhance safety in fires and are a cause of acetylene leaks in general service.</i> | <i>Reference table in RID/ADR 6.2.4 to include a note forbidding fusible plugs.</i> | To be discussed. Seems to be an omission in UN/RID/ADR, as well. | The Group takes note of concerns of industry in Europe about the risks associated with the use of fusible plugs. It agrees that this issue shall be brought to the attention of the Joint Meeting in order to find a solution at the regulatory level. Reference is supported. To be decided at FV stage. |

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| prEN ISO 10462 incl. EA | Gas cylinders - Acetylene cylinders - Periodic inspection and maintenance (ISO/DIS 10462:2012) | Where to refer in RID/ADR: 6.2.4.2 | Applicable sub-sections and paragraphs: 6.2.3.5 |
| WI 023167 | | | |
| Dispatch 1 | | | |

| <p>Assessment, dated 28.7.2012, Dispatch 4.</p> <p>Summary of conclusions: <i>prEN ISO 10462 fully covers all relevant RID/ADR provisions on the periodic inspection of acetylene cylinders. The standard is can be promoted to the FV stage. Two editorial comments, annexed to this assessment relate to the European version of the standard.</i></p> <p>Proposed follow-up action: <i>This standard needs to be discussed by the STD's WG as a replacement of the existing reference to EN 12863:2002 + A1:2005 - Transportable gas cylinders – Periodic inspection and maintenance of dissolved acetylene cylinders in RID/ADR 6.2.4.2.</i></p> | | | | | |
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| Comments from members of the Joint Meeting: | | | | | |
| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CEN Consultant | Comment from WG Standards |
| | | | | | The Group confirms that this standard is a candidate for reference in RID/ADR, subsection 6.2.4.2, as a replacement of EN 12863. |
| UK1 | | <i>The CEN Consultant's suggestions are supported. However, since European Annexes are problematic, we suggest that the bibliographic information is included in the European Foreword</i> | <i>Give the RID and ADR references as a footnote to the Foreword.</i> | | The Group shares the view that the clause on the linkage with RID/ADR in the Foreword of the European version should be termed such as to avoid a modification of the Bibliography of the ISO text. |
| UK2 | Annex A | <i>P200 Table 2 of UN Model Regulations and of RID/ADR specify a test period of 5 years for UN 3374 Acetylene, solvent free</i> | <i>Mention a 5 year period in Annex A for UN 3374</i> | | The Group takes note of the needs seen by industry in Europe to shorten the period till the first periodic inspection to detect cylinders where the porous mass has been shrinking with the consequence of gaps filled with dangerous accumulation of free gas. It agrees that this issue shall be brought to the attention of the Joint Meeting in order to find a solution on the regulatory level. |

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| prEN ISO 16495.2 2 nd submission | Packaging - Transport packaging for dangerous goods - Test methods (ISO/DIS 16495:2012) | | Where to refer in RID/ADR: 6.1.5.1 | Applicable sub-sections and paragraphs: 6.1.5 | |
| WI 261392 | | | | | |
| Dispatch 2, corrected. | | | | | |
| <p>Assessment dated 10.2.2012, Dispatch 2.</p> <p>Summary of conclusions: <i>prEN ISO/DIS 16495.2 can be promoted to the formal vote stage. A few amendments are required to align the text with RID/ADR 2013. Some improvements are also suggested.</i> <i>It is a candidate for reference in RID/ADR. However, it is recommended that ISO 16495 is first moved to the UN level as a candidate to be referenced in the UN Model regulations.</i></p> <p>Proposed follow-up action: <i>This standard needs to be discussed by the STD's WG as a candidate for reference in RID/ADR.</i> <i>So far, no applications have been submitted to the regulatory bodies to take this standard into reference. It is assumed (and recommended to achieve a global harmonization of the test praxis) that ISO will ask to take the ISO standard into reference in the UN Model regulations.</i></p> | | | | | |
| Comments from members of the Joint Meeting: | | | | | |
| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CEN Consultant | Comment from WG Standards |
| UK1 | | <i>Decision on referencing to be made at UN level before consideration for adoption by RID/ADR</i> | | | The Group agrees that this standard is not specific to European aspects and shall be discussed at the UN level first. |

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| prEN 14140 rev | LPG equipment and accessories - Transportable refillable welded steel cylinders for LPG - Alternative design and construction | | Where to refer in RID/ADR: 6.2.4.1 | Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4 | |
| WI 286127 | | | | | |
| Dispatch 2 | | | | | |
| <p>Assessment, dated 20.8.2012, Dispatch 4.</p> <p>Summary of conclusions: <i>A number of RID/ADR provisions are not or not adequately addressed in the standard.</i> <i>The vast majority of the normative references are out of question with regard to non-compliances. The two steel standards have the potential to conflict with the material and general design requirements of RID/ADR. This needs to be checked.</i> <i>Structure, headings and wording of several clauses impede the understanding and application of the standard.</i></p> <p>Proposed follow-up action: <i>This standard needs to be discussed by the STD's WG as an amendment of the existing references to EN 14140:2003 and EN 14140:2003 + A1:2006</i></p> | | | | | |

in RID/ADR, subsection 6.2.4, Table, under “design and construction” and related to 6.2.3.1 and 6.2.3.4 as applicable Subsections.

Comments from members of the Joint Meeting:

| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CEN Consultant | Comment from WG Standards |
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| UK1 | 7.12.2 and Annex B | <i>We are not satisfied that periodic inspection of the exterior of “protected cylinders” will be able to detect corrosion occurring between the steel cylinder and the protective cover. Therefore these cylinders are unsuitable for RID/ADR service and should be excluded from the reference. The adhesion test does not convince that the cover will prevent water contacting the steel indefinitely.</i> | | These technical concerns need to be addressed and convincing proofs provided by those countries where these type of cylinders are in use. | See line below. |
| Comment from WG Standards | | <p>The WG STD’s agreed in its majority that additional steps are required to make the standard acceptable for reference in RID/ADR with respect to protected/ overmoulded cylinders. It was understood that a complete safety concept need to be established in RID/ADR including the essential elements of design, type testing, manufacture, initial and periodic inspection.</p> <p>Whereas design, type testing, manufacture and initial testing are satisfactorily addressed in the standard (except some details as indicated in the Consultants assessment and the comments thereafter. However, it is the missing possibility of the visual inspection of the outer service of the metal cylinder as part of the periodic inspection, which prohibits the acceptance of this standard.</p> <p>However, the Group was provided with the text of the Multilateral Agreement M247, signed in December 2011. It was the impression of the Group that this Agreement describes those elements which are deemed necessary to replace the visual inspection of the outer surface of the metal cylinder.</p> <p>It is the expectation of the Group that the concerned industry will submit proposed amendments of RID/ADR in order to introduce provisions on the design and testing of protected/ overmoulded cylinders for LPG, following the example of the Multilateral Agreement.</p> | | | |
| Comment from WG Standards | | It was strongly recommended to use only one term (“protected” or “overmoulded” cylinder for this kind of cylinders and use this term consistently throughout in all concerned standards and documents submitted to the Joint Meeting. | | | |
| UK2 | 7.2 Table 2; 9 | <i>The CEN Consultant distinguishes between “Production tests” and “Initial inspection and test” in his comments Nos. 9 & 16. Initial inspection and test is divided into tests on an adequate sample (Batch tests) and tests on every cylinder. To my understanding all the “Production tests” are necessary for the “Initial inspection and test” and to aid understanding and use these inspections and tests should be subdivided into “Batch tests” and “Tests on every cylinder”.</i> | <i>Rename “Production tests” as “Initial inspection and tests”. Subdivide into “Batch tests” and “Tests on every cylinder”, especially in Table 2.</i> | I don’t object renaming and restructuring the entity of all manufacturing tests as proposed. | These comments have already been accepted by the TC and the Group expects that the necessary amendments will be made. |

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| UK3 | | <i>Agree that this standard needs improvement in accordance with the Consultant's recommendations</i> | | | |
| NL1 | Annex B | <p>6.2.2.7 (see 6.2.3.9 for refillable non UN cylinders) requires permanently affixed (stamped, engraved or etched) marks on the receptacle.</p> <p>B.1.1 "Each protected cylinder shall be fitted with an individual resilient identification electronic tag...". In B 1.2 an drawing is provided with markings, additional to the electronic tag item "7" in the drawing may contain markings but are not in line with 6.2.2.7 being detachable.</p> | | B.1.1 specifies additional marking of the cage. The required cylinder marking is required in Clause 10 to my satisfaction. | The Group takes note of the techniques used for the stamp marking of the protected cylinder (Invisible stamp marking on the metal cylinder, copied on the bottom of the plastics case and electronically stored in the tag laminated to the case). It was considered indispensable to address the Joint Meeting aimed at amending the marking provisions, including the marking technique used in context with the periodic inspections. |

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| prEN 12972 rev | Tanks for transport of dangerous goods - Testing, inspection and marking of metallic tanks | | Where to refer in RID/ADR: 6.8.2.6.2 | Applicable sub-sections and paragraphs: 6.8.2.4 and 6.8.3.4 | |
| WI 296067 | | | | | |
| Dispatch 3 | | | | | |
| Assessment, dated 2.8.2012, Dispatch 4. | | | | | |
| Summary of conclusions: | | | | | |
| <i>Major amendments are needed to align the standard with RID/ADR and to cover all regulations declared as applicable. A series of other deficiencies of editorial, technical and general nature have been detected and need to be addressed for the preparation of the FV text. Details are given in the Annex to this assessment.</i> | | | | | |
| Proposed follow-up action: | | | | | |
| <i>prEN 12972 rev is a candidate for reference in RID/ADR 6.8.2.6.2 as a replacement of EN 12972:2007 and related to subsections 6.8.2.4 and 6.8.3.4.</i> | | | | | |
| 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 | | <i>Agree that this standard needs improvement in accordance with the Consultant's recommendations</i> | | | To be considered at TC level. |
| NL1 | 4.4.1 | <i>Intermediate inspections of paragraph 4.4.1.also include external inspections (see 5.5).</i> | | The regulator will not object more | To be considered at TC level with respect to further alignment |

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| | | 5.5.1 of EN 12972 requires “Sheathing, thermal or other insulation shall be removed only to the extent required ...”. External inspections and removal of insulation is not required by subsection 6.8.2.4.3 of RID/ADR. | | stringent rules if so applied in practice. | with RID/ADR on one side and the risk of undetected damages (corrosion) on the outside of the shell. |
| NL2 | 5.7.1 | The determination of vacuum test pressure is not in line with the procedure in 6.4.2.3 in EN 14025. Degree of out of roundness is not an argument included in 5.7.1 of EN 12972. | | Seems not meant to be non-compliance with RID/ADR. To be clarified. | To be considered at TC level. It was the understanding of the Group that the vacuum test should be part of type testing and be removed from this standard, therefore. |

B. Standards at Step 3: Submitted for Formal vote

| FprEN ISO 7866 3 rd submission incl. EA | | Gas cylinders - Refillable seamless aluminium alloy gas cylinders - Design, construction and testing (ISO/FDIS 7866:2012) | Where to refer in RID/ADR/ADN: 6.2.4.1 | Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4 | |
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| WI 023118 | | | | | |
| Dispatch 1 | | | | | |
| Assessment, corr., dated 22.6.2012, Dispatch 1. Summary of conclusions: <i>There are no non-compliances between FprEN FDIS 7866 and RID/ADR. Comments by the Standards Working Group on the second enquiry text of the standard and of my assessment of the second FV text have mostly been disregarded. Editorial improvements are still required as well as for the ISO- text as well as for the European Annex.</i> Proposed follow-up action: <i>This standard needs to be discussed again by the STD’s WG for reference in RID/ADR 6.2.4.1, Table, under “for design and construction” and related to subsections 6.2.3.1 and 6.2.3.4.</i> | | | | | |
| Comments from members of the Joint Meeting: The Std’s WG was informed that ISO 7866:2012 has been published meanwhile and is expected to be asked to replace the existing reference to ISO 7866:1999 in the UN Model Regulations. Consequently, it will be including in the harmonization mechanism with RID/ADR and is expected to be referenced in RID/ADR section 6.2.2 for UN pressure receptacles. The fact that EN 1975 (which has a similar scope as ISO 7866) will be withdrawn together the publication of ISO 7866:2012 will create no problems with respect to the approval of new design types if the reference to EN 1975 is kept in RID/ADR. | | | | | |
| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CEN Consultant | Comment from WG Standards |

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| UK1 | Gen | <i>The European Annex requested has been excluded from both the ISO and the EN ISO.</i> | | <i>Retain EN 1975 as a reference.</i> | | The WG STD's confirms that the shortcomings in the European version of the standards don't allow the support for a reference. It agrees that the existing reference to EN 1975 shall be kept. |
| UK 2 | | <i>The shortcomings in the ISO text are noted and the assessment will be brought to the attention of the Convenor since these are also non-compliances with the UN Model Regulations</i> | | | | |
| Decision of the STD's WG: | | Refused | Comments | Proposed transition regulation | Applicable for new type approvals or for renewals | Latest date for withdrawal of existing type approvals |
| | | | | | Until further notice | |

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| EN ISO 11114-1: 2012 | Gas cylinders - Compatibility of cylinder and valve materials with gas contents - Part 1: Metallic materials (ISO 11114-1:2012) | | Where to refer in RID/ADR/ADN: 4.1.4.1, P200 and 4.1.6.15 | Applicable sub-sections and paragraphs: 4.1.6.2 and 6.2.1.2.1 | | |
| WI 023138 | | | | | | |
| Dispatch 1, corr. | | | | | | |
| Assessment, dated 24.10.2011, Dispatch 2. Summary of conclusions: <i>FprEN ISO DIS 11114-1:2011 conforms to the provisions of ADR/RID. It can be approved. The European Foreword shall include the agreed text on the relationship with RID/ADR.</i> Proposed follow-up action: <i>This standard needs to be discussed by the STD's WG as an updated reference in RID/ADR subsection 4.1.4.1, P200 and 4.1.6.15.</i> | | | | | | |
| Comments from members of the Joint Meeting: | | | | | | |
| Country | Clause No. | Comment (justification for change) | | Proposed change | Comment from CEN Consultant | Comment from WG Standards |
| UK1 | | <i>ISO 1114-1:2012 has been published and was accepted for reference to replace the 1997 version in the 18th Revision of the UN Model Regulations at the June 2012 meeting of the Sub Committee of Experts. Harmonisation of RID/ADR will carry this standard into the RID/ADR 2015.</i> | | <i>No action needed</i> | | The Group shares this view. |
| Decision of the STD's WG: | | Accepted | Comments It is expected that the update of this | Proposed transition regulation | No transition regulation required | |

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| | | standard will be part of the UN – RID/ADR harmonization mechanism. | | |
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| FprEN 15888:2012 | Transportable gas cylinders — Cylinder bundles — Periodic inspection and testing | Where to refer in RID/ADR/ADN: 6.2.4.2 | Applicable sub-sections and paragraphs: 6.2.3.5 |
| WI 023164 | | | |

Dispatch 3

Assessment, dated 3.8.2012, Dispatch 4.

Summary of conclusions:

Comments by the Consultant and the Working Group of standards on the enquiry draft have not been considered adequately. One of the comments is of technical nature which isn't allowed in a UAP ballot. Consequently this draft cannot be supported to be approved.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG for reference in RID/ADR subsection 6.2.4.2 and related to the requirements of subsection 6.2.3.5 on the periodic inspection and test of non-UN pressure receptacles.

Comments from members of the Joint Meeting:

The STD's WG was informed that the draft provided for comment and assessed by the Consultant was a draft prepared for the Committee Internal balloting procedure, ready in time prior to the deadline for dispatch to the RID/ADR delegates and not the text subject to the UAP vote yet. This opportunity was used to give the CEN/TC the opportunity to take into account of the comments of the Consultant and the STD's WG.

| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CEN Consultant | Comment from WG Standards |
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| UK1 | | <i>In general the proposals in the CEN Consultant's assessment are supported with the following additions or amendments.</i> | | | To be considered at TC level. |
| UK2 | 5.6, 2nd para., 1st sent. | <i>This reads "Whenever valves are reassessed, the requirements of EN ISO 22434 shall be met." Reassessed is the wrong word and has a specific meaning in TPED.</i> | <i>"Whenever valves are reused, they shall be inspected and maintained in accordance with the requirements of EN ISO 22434."</i> | | The Group confirms that the term "reassessment" shall be avoided as indicated in the comment. It also supports a clarification of the intention of this clause. |
| UK 3 | 5.6, 2nd para., 2nd sent. | <i>The comment made by Standards Working Group is correct, but the sentence that is modified by the comment does not appear in the text circulated for review.</i> | <i>Insert as second sentence "If new valves are fitted <u>they shall conform to the</u></i> | | Understood as editorial comment to be considered at TC level. |

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| | | | <i>original type approval of the bundle shall be maintained.</i> | | |
| UK4 | 6, 3 rd para, 1 st sent. | <i>This sentence reads: - “The next retest date shall be shown on the bundle by either the retester or at the time of first fill.” This does not make sense since a person is not an alternative to a time.</i> | <i>EITHER “The next retest date shall be marked on the bundle by either the retester or the filler at the time of first fill.” OR “The next retest date shall be marked on the bundle at the time of the retest or at the first fill.”</i> | To be considered at TC level. Not related to compliance with RID/ADR. | Understood as editorial comment to be considered at TC level. |
| UK5 | General | <i>The word “retest” is used frequently as a shorthand/synonym for periodic inspection and test. Is this readily understood or should an explanatory note be introduced?</i> | | | The STD’s WG strongly supports this comment aimed at aligning the terms used in the standard with those of RID/ADR |
| UK6 | Bibliography | <i>The reference to the Use of Work Equipment Directive has been amended sufficiently in the text circulated for review, but is unnecessarily long.</i> | <i>Delete EITHER “as implemented in national legislation in countries” OR “in countries”</i> | | The STD’s WG questions the need to refer to this Directive in the introduction and would prefer the deletion from introduction and Bibliography. |
| Decision of the STD’s WG: | | Postponed | Comments | Proposed transition regulation | No transition regulation required |

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| FprEN 13175 | LPG Equipment and accessories - Specification and testing for Liquefied Petroleum Gas (LPG) pressure vessel valves and fittings | Where to refer in RID/ADR/ADN: | Applicable sub-sections and paragraphs: |
| WI 286114 | | 6.2.4.1 | 6.2.3.1 and 6.2.3.3 |
| | | 6.8.2.6.1 | 6.8.2.1.1, 6.8.2.2, 6.8.2.4.1 and 6.8.3.2.3 |

Dispatch 2

Assessment, dated 11.8.2012, Dispatch 4.

Summary of conclusions:

A number of technical RID/ADR provisions are not or not adequately addressed in the standard. Some references have the potential to conflict with RID/DR. The reference to these standards needs to be complemented by additional requirements in EN 13175 with respect to the design against the dynamic forces of handling and travel. The marking clause needs to be amended to comply with the provisions of TPED.

It is suggested to ask the Tank Working Group with the Joint Meeting to assess whether or not the design requirement against the dynamic forces of handling and transport is relevant for industrial valves and other service equipment.

The nature of these conclusions doesn't allow a support for approval. More details and suggested amendments are annexed to this assessment.

Proposed follow-up action:

This standard needs to be discussed by the STD's WG as a candidate for reference in RID/ADR, sections 6.2.4.1, Table under "for closures", related to 6.2.3.1 and 6.2.3.3 as applicable subsections as well as in RID/ADR 6.8.2.6.1, Table, under "For tanks for gases of Class2" and indicating 6.8.2.1.1, 6.8.2.2, 6.8.2.4.1 and 6.8.3.2.3 as applicable subsections and paragraphs.

Comments from members of the Joint Meeting:

| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CEN Consultant | Comment from WG Standards |
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| UK | General | <i>Agree with the CEN consultant that the standard is not yet suitable for reference.</i> | | | To be considered at TC level. In particular, the Group confirms that the RID/ADR requirements on the dynamic design of tank equipment (against the g-loads specified in RID/ADR 6.8.2.1.2.6.8) need to be considered in the standard. It is noted that EN 14129 includes an impact test (Clause 6.5.5) which is considered as an adequate tool to demonstrate compliance with this requirement. |
| NL1 | 3.1.7 | <i>Note at paragraph 3.17 is superfluous, automotive applications are already excluded in the scope.</i> | | To be considered at TC level. Not related to compliance with RID/ADR. | To be considered at TC level. |
| NL2 | 8.12 | <i>The wording in 8.12 is confusing "...leak tight when a vacuum of 50mBar absolute is applied..".</i> | <i>Alternative: "... leak tight when a pressure of 50mBar absolute is applied.."?</i> | | |
| NL3 | | <i>Production testing is described in Annex E and "batch testing" is possible. In paragraph 10 however no markings are foreseen to make reference to a certain batch (i.e. serial/batch number).</i> | | | |
| NL4 | | <i>EN 13175 is supportive to EN 12252 and as such included in the normative references of this standard.</i> | | | The Group was aware that the direct referencing in RID/ADR is |

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| | | <i>Considering the limited scope of EN 13175 for LPG only, the indirect reference in EN 12252 may be sufficient.</i> | | | necessary to allow separate type approvals for valves acc. to this standard. |
| Decision of the STD's WG: | Refused | Comment Strong concerns were expressed with respect to the application of equipment according to this standard for rail tank wagons. Such application would need to be consulted with rail experts. | Proposed transition regulation | Applicable for new type approvals or for renewals | Latest date for withdrawal of existing type approvals |
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| FprEN 14129 | LPG Equipment and accessories - Pressure relief valves for LPG pressure vessels | | Where to refer in RID/ADR/ADN: 6.8.2.6.1 | Applicable sub-sections and paragraphs: 6.8.2.1.1 and 6.8.3.2.9 | |
| WI 286128 | | | | | |
| Dispatch 3 | | | | | |
| Assessment, dated 12.8.2012, Dispatch 4. Summary of conclusions: <i>There are no non-compliances with RID/ADR in the submitted draft. It can be approved. None of the normative references is conflicting with RID/ADR. There is no obstacle for a reference in RID/ADR.</i> Proposed follow-up action: <i>FprEN 14129 needs to be discussed by the STD's WG as a candidate for reference in RID/ADR 6.8.2.6.1 indicating subsections 6.8.2.1.1 and 6.8.3.2.8 as applicable regulations.</i> | | | | | |
| 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 | | <i>Agree that this standard can be referenced</i> | | | To be considered at TC level. |
| Additional comment: The Group recommends that the figures in the standard, illustrating threaded connections to the shell of the tanks should be reviewed. They could be misunderstood that valves could threaded directly into the thin shells of transportable tanks. | | | | | |
| NL1 | | <i>In relation to CEN consultants remarks on prEN 13175 (see page 4 CEN assessment document) dynamic conditions are not part of EN 14129 either. If this is considered to be an issue in EN 13175 this may also apply to PRV's.</i> | | The relevance of the RID/ADR design requirement on service equipment against dynamic forces should generally be | The Group was satisfied by the solution found in this standard to address dynamic impacts by the inclusion of an impact test in this standard. This solution would also be supported in similar cases. |

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| | | | | clarified. | |
| NL2 | | <p><i>Scope of this standard is limited to LPG only. Most of the standard gas tankers are approved for a wide range of liquefied hydro carbon gases of which many outside of the definition of LPG.</i></p> <p><i>Due to the (commonly in LPG industry used) allowed maximum leakage rate of 15cm³/h regardless of size of valve, using the standard for a general application for under pressure liquefied gas is not acceptable. Only giving a reference for PRV's for "LPG only" will leave users in confusion. Indirect reference in EN 12252 "equipping LPG tankers" is an option.</i></p> | | | <p>The Group sees no possibility to impose a broader Scope for the standard, as CEN/TC 286 is dedicated to LPG, only.</p> <p>The Group agrees that the leakage rate should be related to the size of the valve and refers to the example given in EN 12266.</p> |
| Decision of the STD's WG: | Accepted | Comment | Proposed transition regulation | Applicable for new type approvals or for renewals | Latest date for withdrawal of existing type approvals |
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| FprEN 14893 Advanced draft for 2 nd UAP | LPG equipment and accessories - Transportable Liquefied Petroleum Gas (LPG) welded steel pressure drums with a capacity between 150 litres and 1 000 litres | Where to refer in RID/ADR/ADN: 6.2.4.1 | Applicable sub-sections and paragraphs: 6.2.3.1 and 6.2.3.4 | | |
| WI 286143 | | | | | |
| Dispatch 2. | | | | | |
| Assessment, dated 14.8.2012, Dispatch 4. | | | | | |
| Summary of conclusions: | | | | | |
| <i>There are still some non-compliances with RID/ADR in the submitted draft. These are related to the elements of the initial inspection and test and to the lifting test. This doesn't allow a support for the approval of the new draft..</i> | | | | | |
| Proposed follow-up action: | | | | | |
| <i>This standard needs to be discussed by the STD's WG as an amendment of the existing references to EN 14893:2006+AC:2007 in RID/ADR 6.2.4.1, Table, under "for design and construction" and related to subsections 6.2.3.1 and 6.2.3.4..</i> | | | | | |
| Comments from members of the Joint Meeting: | | | | | |
| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CEN Consultant | Comment from WG Standards |
| UK1 | 6.4 | <i>The comment made by the CEN Consultant on Clause</i> | | | These comments are deemed to |

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| | | <i>6.5 concerning wall thickness is supported, but it applies to clause 6.4 in the version circulated for review.</i> | | | support the understanding of the assessment by the CEN Consultant. |
| UK2 | 6.6.6 | <i>The CEN Consultant's comment on clause 6.6 and the note on marking apply to clause 6.6.6.</i> | | | |
| UK3 | 7 | <i>Clause 7 is 7 pages long and although the CEN Consultant's proposal to change it to 6.10 is logical, it does not aid readability. Also, the title "Inspection of welds" is accurate and informative.</i> | <i>No change</i> | To be considered at TC level. Not related to compliance with RID/ADR. | <p>The STD's WG took note from the information, that these comments as well as those of the comments by the CEN-Consultant have been accepted by the responsible convenor.</p> <p>The members of the Group have been provided with the response of the convenor in writing.</p> <p>It is understood that the suggested amendments are considered for the text to be published.</p> <p>The Consultant and UK withdraw their comments on the testing of the lifting lugs following the explanations given by the Convenor.</p> |
| UK4 | 8 | <i>We agree that Clause 8 should be reformatted as proposed by KW. As written it is very difficult to know when tests have to be performed.</i> | | | |
| UK 5 | 8.2 | <i>The type approval tests on lugs require a force of 2 times the maximum gross weight. The test here should use the same force.</i> | | | |
| UK 6 | Annex D | <i>It would be helpful to make the title clear that the whole of this Annex applies only to welding imperfections</i> | <i>Title of Annex D to be "Imperfections of welded joints"</i> | To be considered at TC level. Not related to compliance with RID/ADR. | |
| UK7 | E.3 | <i>The authors mean "reinforcement" in the title; re-enforcement, means enforcing again, not making stronger.</i> | <i>Change title to "Nozzle reinforcement"</i> | | |
| Decision of the STD's WG: | Accepted | Comment | Proposed transition regulation | Applicable for new type approvals or for renewals | Latest date for withdrawal of existing type approvals |
| | | | EN 14893:2006 + AC :2007 | Until 31 December 2016 | |
| | | | EN 14893:2012 | Until further notice | |

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| FprEN 16257 | Tanks for the transport of dangerous goods - Service equipment - Footvalve sizes other than 100 mm dia (nom) | Where to refer in ADR: 6.8.2.6.1 | Applicable sub-sections and paragraphs: 6.8.2.2.1 and 6.8.2.2.2 |
| WI 296054 | | | |
| Dispatch 2 | | | |
| Assessment, dated 8.3.2012, Dispatch 2. Summary of conclusions: | | | |

| <p><i>FprEN 16257 is considered compliant with ADR and can be approved.</i></p> <p>Proposed follow-up action: <i>This standard needs to be discussed by the STD's WG as a candidate for reference in ADR subsection 6.8.2.6.1 and related to the requirements of paragraphs 6.8.2.2.1 and 6.8.2.2.2.</i></p> | | | | | |
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| Comments from members of the Joint Meeting: | | | | | |
| Country | Clause No. | Comment (justification for change) | Proposed change | Comment from CEN Consultant | Comment from WG Standards |
| D1 | | <i>We support the reference of this standard. The content of prEN 16257 should be incorporated in EN 13308 and EN 13316 by a future revision of these standards.</i> | | | The STD's WG supports the reference to this standard as well as a merger of the three standards as indicated. |
| UK | | <i>Agree that this standard can be referenced</i> | | | |
| Decision of the STD's WG: | Accepted | Comment | Proposed transition regulation | Applicable for new type approvals or for renewals | Latest date for withdrawal of existing type approvals |
| | | | | Until further notice | |