### **Economic Commission for Europe**

**Inland Transport Committee** 

Working Party on the Transport of Dangerous Goods

3 September 2013

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Geneva, 17-27 September 2013 Item 3 of the provisional agenda **Standards** 

# Agreed comments by participants 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.1/2013/55, 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 2013, standards at enquiry and formal vote stage as well as one published standard and related assessments by the CEN Consultant were made available on the dedicated CEN webpage. Some of them were not yet included in ECE/TRANS/WP.15/AC.1/2013/55 because they became available only after the deadline for submission of working papers for the Joint Meeting.

Dispatches and related deadlines for comments were as follows:

- Dispatch 1, 2013-03-18: 6 September 2013.
- Dispatch 2, 2013-06-13: 12 July 2013.
- Dispatch 3, 2013-07-04: 5 August 2013.
- 3. As agreed during the March session of the Joint Meeting the cooperation agreement with CEN does now include the optional use of telephone/video conferences("telecons") for the discussion of comments by participants of the Joint Meeting (see report ECE/TRANS/WP.15/AC.1/130, para. 13). The following telecons were organized by CCMC on 15, 16, 22 and 29 July and 19 and 20 August, related to the subjects
  - Pressure receptacles (except for LPG)
  - · LPG receptacles and tanks
  - · Packagings and
  - Tanks (except for LPG).

The agreed comments of the Working Group on Standards (Std's WG) are compiled in this document.

- 4. Unresolved issues are intended to be discussed and final conclusions to be agreed during the first session week of the Joint Meeting in September (indicated in the last column of the attached tables).
- 5. Proposals on the amendment of RID/ADR/ADN to become effective by 1.1.2015 are part of the separate meeting report of the Working Group on Standards which will be agreed with the members of the STD's WG.



# Annex

# A. Standards at Stage 2: Submitted for Public Enquiry

Dispatch 3

prEN 14912 WI 286144		LPG Equipment and accessories – Inspection and maintenance of LPG cylinder valves at time of periodic inspection of cylinders	Where to refer in RID/ADR: questioned	Applicable sub-sections and paragraphs: 6.2.1.6.1	
Assessme	ent from CEN	N Consultant not yet provided.			
Commer	nts from mer	nbers of the Joint Meeting:			
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK 1	Foreword	Second sentence of the final paragraph to be deleted. RID and ADR to be added to the Bibliography.		Was agreed as a general rule.	Agreed.
UK 2	5.4	The requirement that the reseating pressure shall be not less than the maximum operating pressure of the cylinder is surely wrong. Reseating should only be possible once the pressure has gone below the maximum operating pressure.  The difficulty arises because 'maximum permissible operating pressure' is not defined. For gas cylinders this could be taken as test pressure, i.e. developed pressure at 65° C. Perhaps the opening pressure could be referenced to the test pressure so that reseating at 70% would be a sufficient requirement?	and in any case not <b>more</b> than the maximum permissible operating pressure of the cylinder.	Understand that the clause wants to see the valve to be closed again as soon as reasonable. Don't agree. To be discussed.	WG agrees that improvement is required.

Assessed by CEN Consultant on 27.5.2013 (Dispatch 1)

Summary of conclusions

The scope and some clauses don't comply with the intentions of this standard and need to be revised. Additional essential amendments are recommended. However, none of the clauses contradict to the related RID/ADR provisions. It can be promoted to the FV stage.

As far as related to the compliance with RID/ADR comments of this assessment are inserted in the following table.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
F 1	Title	"Venting systems" is not the term used in RID/ADR 2013.	Replace by "breather devices"	Agree.	Agreed; Clause 5, Note, first sentence to be deleted.
NL 1	Scope	Delete the reference to EN 14596. Otherwise the use of other types of EPRV's will be excluded.			Not discussed.  Final conclusion to be agreed at the Joint Meeting session in September.
CEN TDG-Consultant 8	6	As outlined in para. 3.3 of my assessment, the placing of flame arrestors is subject to the following ADR provision:  6.8.2.2.3 If the protection consists of a suitable flame trap or flame arrester, it shall be positioned as close as possible to the shell or the shell compartment. For multi-compartment tanks, each compartment shall be protected separately.  This provision isn't addressed in the standard.  NL- comment: This is an installation requirement on the tank and cannot be considered by manufacturer of equipment. A footnote should be OK.	close as possible to the compartment. For mu	nall be positioned as e shell or the shell lti-compartment tanks, all be protected	Not supported. Applies to the tank design standard (EN 13094).

NL 2 General Standard is so limited in contents that it should be considered to be taken over as a requirement in ADR itself.  Standard is so limited in contents that it should be agreed at the Joint M session in September.
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prEN 14433 rev	Tanks for the transport of dangerous goods - Tank	Where to refer in	Applicable sub-sections and paragraphs:
WI 296080	equipment for the transport of liquid chemicals and liquefied gases - Foot valves	RID/ADR: 6.8.2.6.1	6.8.2.2.1

Assessed by CEN Consultant on 18.6.2013 (Dispatch 1)

Summary of conclusions

The scope and some clauses don't comply with the intentions of this standard and need to be revised. Additional essential amendments are recommended. However, none of the clauses contradict to the related RID/ADR provisions. It can be promoted to the FV stage.

As far as related to the compliance with RID/ADR comments of this assessment are inserted in the following table.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
F 1	Various edit	To be considered at TC-level.			
UK 1	Scope	Cryogenic gases (in the final sentence) is not the term used in RID/ADR and should be replaced. NL-comment: Agree	Use 'Refrigerated liquefied gases'	Agree.	Agreed.
F 2	3.1	Maximum working pressure (ADR/RID chapter 6.8) MWP  Maximum pressure up to which the valve can be operated, at least test pressure divided by 1,3.	Replace "at least by not more than the" as follows: "maximum pressure up to which the valve can be operated, not more than the test pressure divided by 1,3"	ADR 1.2.1, definition of "Maximum working pressure (gauge pressure)" terms "shall not be lower than". Standard seems to be compliant.	Acc. to CEN rules definitions shall not include requirements. Requirements shall be part of the standard. The definition of MWP is found in ADR 6.8.2.4.1. Corrected wording is required.

F3	3.2	Maximum allowable working pressure (ADR/RID chapter 6.7) MAWP Maximum pressure up to which the valve can be operated, at least test pressure divided by 1,3 (liquefied gases) respectively 1,5 (liquids) NL- comment: Agree CEN with consultants remarks, use wording as in regulation.	Replace "at least by not more than the" as follows: "maximum pressure up to which the valve can be operated, not more than the test pressure divided by 1,3 (liquefied gases) respectively 1,5 (liquids)."	ADR 6.7.2.1, definition of MAWP reads "shall not be less than the highest of the following pressures". Standard seems to be compliant.	Acc. to CEN rules definitions shall not include requirements. Requirements shall be part of the standard.  The definition of MAWP is found in ADR 6.7.2.3.2 (liquids) and 6.7.3.3.2 (for gases).  Corrected wording is required.
tant TDG 1	5.2	RID/ADR require that the effect of an overturning of the tank on the service equipment is considered. If foot valves are operated from above an impact on its leaktightness is thinkable.	If relevant, add an appr	Final conclusion to be agreed at the Joint Meeting session in September.	
CEN Consultant TDG 1		NL- comment: Leakage of top operation due to accidents is not a known problem with current designs. However a general requirement or a foot note that it should remain tight can be an useful addition.			
CEN Consultant TDG	5.2	RID/ADR require that Gaskets ensuring the leakproofness of fittings requiring manipulation during normal use of tanks shall be so designed and arranged that manipulation of the fittings incorporating them does not damage them. This requirement isn't addressed in the standard.			The Group agrees that this requirement is covered by the cycling test (clause 7.5).
CE		NL- comment: OK.			

CEN Consultant TDG 3	5.2.6	This clause requires a marking with the direction of opening (as a minimum).  RID/ADR require that the setting of the valve – open or closed – is clearly apparent and shall so far as possible in each case be capable of being verified from the ground.  This requirement isn't covered by the standard.	Amend the clause adequately.	The Group agrees that this requirement is related to the tank design and shall be considered in tank design standards (EN 14025).
CENC		NL- comment: In practice open/close position is part of the tank installation and differs from tank design. Manufacturer of valve cannot include this in the design. Footnote would be possible.		
CEN Consultant TDG 4	5.3	RID/ADR include compatibility requirements for the materials used.  In particular, it is required that the gaskets shall be made of a material compatible with the substance carried and shall be replaced as soon as their effectiveness is impaired, for example as a result of ageing.  There is no compatibility requirement included. The standard seems to follows a concept where the user of the tank needs to assess the compatibility based on information as required in Clause 5.3.1.  This concept is questioned.	Add adequate compatibility requirements.	It is the feeling of the Group that the addition of a Note is justified in order to remind the designer, competent authority and carrier that this requirement shall be met.  Final conclusion to be agreed at the Joint Meeting session in September.
		NL- comment: Approval of the valve remains part of the tank approval, a list of checked substance is possibility but tank approver has final word.		
CEN Consultant TDG 5	6.1	The replacement of water by other liquids or gases is – acc. to RID/ADR subject to the agreement of the expert approved by the competent authority and for special cases. This isn't considered in this clause.	Add a note similar to:  NOTE The replacement of water by other fluids is subject to the agreement of the expert approved by the competent authority.	The WG sees this requirement only related to the testing of the tank (shell). A note is not deemed
CEN C		NL- comment: Is this realistic for this application? This is for tank approval and arguments to do tanks differently are not relevant for type approval of valves.		necessary.

CEN Consultant TDG 6	7	The regulations now include separate type approvals for service equipment (RID/ADR, subsection 6.8.2.3.1, last paragraph).  This option should now also be included in the standard. All other main elements of a conformity assessment scheme are there (Design type specification, type testing, production tests).  NL- comment: Do not oversee this remark. Is type	Add a clause on Type approval.	The Group supports the addition of an informative clause, as suggested.
C		approval not part of the regulation itself. Can this be part of the standard on design/testing?		
CEN Consultant TDG 7	9	Following the recommendation adding a type approval clause it would be recommended to add the approval number.	Consider the addition of the type approval number.	Not supported in lack of a legal requirement.
CENC		NL- comment: Type approval number is for the regulation.		
	General	Original comments were on the break- away test, the safety that the outlet would break away before the shell fails. This is still not very well developed.		Final conclusion to be agreed at the Joint Meeting session in September.
NL 1		Now gas is suddenly included in this standard so it become a general bottom valve standard, should ball-valves (cannot be included now because of tech requirements in standard) and sluice valves also be included. Then standard should be modified further.		

prEN 14432 rev WI 296069	Tanks for the transport of dangerous goods - Tank equipment for the transport of liquid chemicals and liquefied gases - Product discharge and air inlet valves	Where to refer in RID/ADR: 6.8.2.6.1	Applicable sub-sections and paragraphs: 6.8.2.2.1
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Assessed by CEN Consultant on 19.6.2013 (Dispatch 2)

Summary of conclusions

The scope and some clauses don't comply with the intentions of this standard and need to be revised. Additional essential amendments are recommended. However, none of the clauses contradict to the related RID/ADR provisions. It can be promoted to the FV stage.

As far as related to the compliance with RID/ADR comments of this assessment are inserted in the following table.

Comme	nts from me	mbers of the Joint Meeting:			
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
NL 1	General	It should be made clear in ADR what the scope of application is. So far, only valves directly attached to the tank are included as referenced standards and not the secondary closures.			Final conclusion to be agreed at the Joint Meeting session in September.
F 1	Various edi	torial comments, not related to the compliance with RID	ADR have been neglected	ed	To be considered at TC level.
UK 1	Scope	Cryogenic gases (in the final sentence) is not the term used in RID/ADR and should be replaced.	Use 'Refrigerated liquefied gases'	Agree.	Agreed.
NL 2	Scope	The scope should be clear if all kind of design valves are included such as butterfly valves, ball-valves, sluice valves or the squeezed tube kind of valves.			Final conclusion to be agreed at the Joint Meeting session in September.
F 2	3.1	Maximum working pressure (ADR/RID chapter 6.8) MWP - maximum pressure up to which the valve can be operated, at least test pressure divided by 1,3.	Replace at least by not more than the as follows: "maximum pressure up to which the valve can be operated, not more than the test pressure divided by 1,3."	ADR 1.2.1, definition of "Maximum working pressure (gauge pressure)" terms "shall not be lower than". Standard seems to be compliant.	Acc. to CEN rules definitions shall not include requirements. Requirements shall be part of the standard. The definition of MWP is found in ADR 6.8.2.4.1. Corrected wording is required.
F3		Maximum allowable working pressure (ADR/RID chapter 6.7), MAWP Maximum pressure up to which the valve can be operated, at least test pressure divided by 1,3 (liquified gases) respectively 1,5 (liquids)	Replace at least by not more than the as follows: "maximum pressure up to which the valve can be operated, not more than the test pressure divided by 1,3 (liquified gases) respectively 1,5 (liquids)".	ADR 6.7.2.1, definition of MAWP reads "shall not be less than the highest of the following pressures". Standard seems to be compliant.	Acc. to CEN rules definitions shall not include requirements. Requirements shall be part of the standard. The definition of MAWP is found in ADR 6.7.2.3.2 (liquids) and 6.7.3.3.2 (for gases).  Corrected wording is required.

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CEN Consultant TDG 6	7	The regulations now include separate type approvals for service equipment (RID/ADR, subsection 6.8.2.3.1, last paragraph).  This option should now also be included in the standard. All other main elements of a conformity assessment scheme are there (Design type specification, type testing, production tests).	Add a clause on Type approval.	The Group supports the addition of an informative clause, as suggested.
CEN Consultant TDG 7	9	Following the recommendation adding a type approval clause it would be recommended to add the approval number.	Consider the addition of the type approval number.	Not supported in lack of a legal requirement.
NL 3	9	It is suggested to delete the markings in part 9. The valves are general industrial valves and adding this marking will result in additional plates that fall of in use or have a double logistic system with identical valves.		Final conclusion to be agreed at the Joint Meeting session in September.

prEN 13094 rev WI 296066	Tanks for the transport of dangerous goods - Metallic tanks with a working pressure not exceeding 0,5 bar - Design and construction	Where to refer in RID/ADR: 6.8.2.6.1	Applicable sub-sections and paragraphs: 6.8.2.1		
Assessed by CEN Consultant on 2.7.2013 (Dispatch 2) Summary of conclusions					

The scope and some clauses don't comply with the intentions of this standard and need to be revised. Additional essential amendments are recommended. However, none of the clauses contradict to the related RID/ADR provisions. It can be promoted to the FV stage.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
F 1	Various edit				
Consulta nt 1		Note 2 excludes fixed rail tank wagons. (This exclusion is missing in the existing references to this standard in the table in 6.8.2.6.1 RID/ADR).	The references to this st 6.8.2.6.1 may need to be fixed rail tank wagons.	Supported.	

CEN TDG-Consultant 2	6	The following RID/ADR design and construction requirements aren't addressed in this standard: Leaktightness of liners as stressed under normal conditions (6.8.2.1.24), Design of thermal insulation to prevent blocked access to service equipment (6.8.2.1.25), Avoidance of metal contacts causing electrochemical corrosion (6.8.2.1.26) and Mounting of at least one marked earth fitting (6.8.2.1.27).	Addition of additional clauses required for alignment with RID/ADR.	Discussion to be continued. Final conclusion to be agreed at the Joint Meeting session in September.
UK 1	6.3	The meaning of equivalent diameter is not defined and not so obvious that such a definition is not required. I can find no statement of the purpose of this calculation, except for Table 1 where the role of equivalent diameter is implied but not stated.	Define equivalent diameter and indicate its relevance to ADR requirements	Additional information in a note is supported.
CEN TDG- Consultant 3	3.1.15	This standard uses the term "heaviest load" in difference to the RID/ADR term "maximum permissible load".	Alignment of this term is suggested.	Comment withdrawn following the finding that both terms relate to different subjects.
CEN TDG- Consultant 4	6.5	RID/ADR 6.8.2.1.1 require tanks to withstand the static and dynamic stresses Static stresses are not expressively mentioned, but included in 6.5 "Pressure conditions".	Suggest amending the title to read 6.5 Static and pressure conditions	Supported.
CEN TDG- Consultant 5	6.5	One specific RID/ADR requirement on the static design is missing. Subsection 6.8.2.1.13 requires that: In the case of vehicles in which the tank constitutes a stressed self-supporting member, the shell shall be designed to withstand the stresses thus imposed in addition to stresses from other sources.	Add an additional paragraph addressing self- supporting tank designs as required by RID/ADR.	The Group supports the addition of a clause in 6.4, as suggested.

CEN TDG-Consultant 6	8.4.1.2	Whereas RID/ADR 6.8.2.1.23 require that The manufacturer's qualification for performing welding operations shall be one recognized by the competent authority. The standard requires that "welding processes shall be approved".In addition RID/ADR adds: Where the competent authority has doubts regarding the quality of weld beads, it may require additional checks.	Improvement is suggested, at least with respect to additional checks by the competent authority.  Alignment is suggested.		Supported.
Consultant 7	6.9.2.1 Table 1	In difference to the term "pure aluminium" RID/ADR are using the term "Pure aluminium of 99,8%"			Supported.
F 1	6.9.2.2.c)	According to ADR, the plate may be inside.	Delete "to the outside of".		Comment withdrawn.
F 2	6.9.2.3, Table 2	The values for austenitic-ferritic stainless steel don't conform to ADR.	Replace the values for austenitic-ferritic stainless steel by "3, 4, 3"	Earlier comment withdrawn.	Preliminary supported. An additional check is intended.  Final conclusion to be agreed at the Joint Meeting session in September.
F 3	6.14.2.2 j), 6.14.2.3 d) and 6.14.2.4 f)	the introduction of austenitic-ferritic stainless steel in RID/ADR 2013 should be taking into account.		Agree.	Preliminary supported.  Final conclusion to be agreed at the Joint Meeting session in September.

### B. Standards at Stage 3: Submitted for Formal vote

Dispatch 1

+ <b>FprA1</b> WI 023163	Gas cylinders - Refillable seamless steel tubes for compressed gas transport, of water capacity between 150 l and 3000 l - Design construction and testing - Amendment 1: Requirements for design of tubes for embrittling gases (EN ISO 11120:1999/DAM 1:2011)	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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Assessed by CEN Consultant on 13.3.2013 (Dispatch 1)

Summary of conclusions

EN ISO 22435:2007 + prA1 is compliant with RID/ADR and can be approved. No editorial improvement is considered necessary.

Country	Clause No.	Comment (justification for change)		Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK		No comments, transition proposal agreed, but see the revised start date for the 1999 version. A complete revision of this standard should reach formal vote in 2013/14 and accelerated withdrawal of type approvals may be warranted in 2017.				
Decision of the STD's WG:		The Group agrees that the amendment	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals	
	with the shortest transition period to avoid hydrogen embrittlement of cylinders which are approved for the carriage of gases with the risk of hydrogen embrittlement. However, there is seen no	EN ISO 11120:1999	Between 1 July 2001 and 31 December 2016	31 December 2016 for tubes approved for gases subject to special packing provision 'd' in P 200		
			embrittlement. However, there is seen no reason to shorten the normal lifetime of	EN ISO 11120:1999 + <b>A1:[2013</b> ]	Until further notice	
			We need to address all gases causing hydrogen embrittlement – these have special packing provision 'd' in P200.			

FprEN ISO/FDIS 3807	Gas cylinders – Acetylene cylinders – Basic requirements and type testing	Where to refer in RID/ADR:	Applicable sub-sections and paragraphs: 6.2.1.1.9
WI 023166		4.1.4.1, P200, (10)p and 6.2.4.1	

Assessed by CEN Consultant on 10.4.2013 (Dispatch 3)

Summary of conclusions

All comments related to the ISO text are no longer relevant or have been addressed adequately. The EN version needs to include the usual reference to RID/ADR. The FV draft of this standard is now fully compliant with the related provisions of RID/ADR. The EN version needs to include the usual reference to RID/ADR.

Follow-up action by the Joint Meetings STD's WG

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.

It was 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. However, so far, the draft amendments to the 17th revised edition don't include this change.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	Gen	Accept the Consultant's recommendation for referencing. The reference shall forbid the fitting of fusible plugs in a note with the title of the standard.	Addition of the following note in the title column: <b>NOTE:</b> Fusible plugs shall not be fitted		

Decision of the STD's WG:	Accepted	Comments Notwithstanding the intention to apply	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
		for a reference to ISO 3807 in the UN Model regulations, once it has been approved, it was agreed asking for a	EN 1800:2006	Between 1 January 2009 and 31 December 2016	
			EN ISO 3807:[2013]	Until further notice	

<b>FprEN 15888</b> 2 <sup>nd</sup> submission	Transportable gas cylinders - Cylinder bundles - Periodic inspection and testing	Where to refer in RID/ADR:	Applicable sub-sections and paragraphs: 6.2.3.5
WI 023164		6.2.4.2	

Assessed by CEN Consultant on 17.4.2013 (Dispatch 2)

Summary of conclusions

This draft is now compliant with the provisions of RID/ADR and is supported to be approved. However, editorial comments by the STD's WG made on the preliminary draft, dated 2012-07 need to be considered prior to publication.

Follow-up action by the Joint Meetings STD's WG

This standard – reedited - needs again (a decision of a reference was postponed at the session in September 2012) 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.

At this occasion, the Joint Meeting may be made aware of the fact that the marking provisions for bundles of cylinders are incomplete with respect to the marking of the periodic inspections.

Country	Clause No.	Co	omment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK1	Foreword, 3 <sup>rd</sup> para.	The second sentence shall be deleted as agreed by CEN and the Joint Meeting			Was agreed as a general rule.	Agreed
UK2	Gen	No other comments; the recommendations of the Standards WG were editorial and have been adopted sufficiently.				ОК
Decision of the STD's WG:		Accepted		Comments		No transition regulation required

FprEN ISO/FDIS	Packaging — Transport packaging for dangerous	Where to refer in	Applicable sub-sections and paragraphs: 6.1.5.2.5 – 6.1.5.2.8, 6.1.6 and 6.5.6.3.4 – 6.5.6.3.6
13274	goods — Plastics compatibility testing for	RID/ADR	
WI 261393	packaging and IBC (ISO 13274:2013) s	6.1.5.2 and 6.5.6.3	
W1 201393	<b>F</b> gg = 0 (-2 0 -0 -1) 1		

Assessed by CEN Consultant on 3.4.2013 (Dispatch 2)

Summary of conclusions

FprEN ISO/FDIS 13274 can be approved. Some deficiencies need to be removed prior to publication. However, there are no contradictions to related RID/ADR provisions. It is a candidate for reference in RID/ADR.

Follow-up action by the Joint Meetings STD's WG

This standard is considered a candidate for reference in RID/ADR 6.1.5.2 and 6.5.6.3 and needs to be discussed by the STD's WG, based on the guidance document quoted in the footnote below.

This document is part of the enquiry draft assessment, see Dispatch 2 for the March 2011 session.

<sup>&</sup>lt;sup>1</sup> Karol E. Wieser, CEN Consultant, Guidance on the evolution on chemical compatibility proofs for plastics packagings and IBC's for the transport of dangerous goods, dated 14.9.2007.

Comme	Comments from members of the Joint Meeting:							
Country	Clause No.	Co	omment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards		
D1	General	ADR/RID it in ADR/RID necessary to standard liqual laboratory meaning would be off. Now they ar removed the because ther ADR/RID at	plications between the standard and would be reasonable to make a reference to EN ISO 13274. Therefore it would be revise Chapter 6.1 e. g. regarding the aids. This part could be deleted then. The nethods also described in EN ISO 13274 ficialised by the reference in ADR/RID. The part of the unofficial part of RID. We assimilation list from the standard the were differences between the list of and the list of the standard. The assimilation only remain in ADR/RID Chapter 4.1.	Amendments of RID and ADR required as indicated.	Agree; supported.	Agreed. The WG welcomes the offer of Germany to submit a proposal for amendment of RID/ADR deemed to take this standard into reference in Parts 4 and 6 and following the advice given by the guidance document, quoted above.		
Decision of the STD's WG:		Accepted	C	Comments				

FprEN 14893 WI 286143	LPG Equipment and accessories – Transportable Liquefied Petroleum Gas (LPG) welded steel pressure drums with a capacity between 150 litres and 1000 litres	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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Assessed by CEN Consultant on 5.3.2013 (Dispatch 1)

Summary of conclusions

All non-compliances with RID/ADR 2013 have been removed in the new draft. It can now be approved. A single editorial mistake needs to be corrected prior to publication.

Follow-up action by the Joint Meetings STD's WG

No action required, as EN 14893:2013 has already been adopted for reference in RID/ADR 2015.

Comme	nts from mei	i	Joint Meeting:	<del> </del>	i	<u> </u>
Country	Clause No.	Со	mment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK 1	4.1 & 5.2.2	should resist Therefore, the should be 65 tanks, not predesign a cylic conditions in This is unlik	of P200 is that pressure receptacles the developed pressure at 65 °C. he upper end of the temperature range 6 °C, not 50. The range given is that for essure receptacles. It is not logical to under for + 50° C when the known service helude the pressure developed at 65° C. ely to be a safety issue since materials 50° C are likely to be suitable for 65° C.		These clauses are related to the design, the selection of materials for which RID/ADR 6.2.1 and 6.2.3 don't include upper temperature limits. The impact on the test pressure is adequately covered by the requirement in Clause 5.2.1 asking for a test pressure of not less than 30 bar, which is the maximum value for LPG substances in P200, Table 2.	WG doesn't support this comment and sees no need for an amendment.
UK 2	6.15	EN 473 has	been replaced by EN ISO 9712:2012	Editorial – Not for discussion by the Standards WG	Supported.	Need to be corrected when being edited.
UK 3	9 Note	The cross reference to the TPED in the Bibliography should be [10], not [9].		Editorial – Not for discussion by the Standards WG	Supported.	Need to be corrected when being edited.
Decision STD's V		Accepted	Comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawa of existing type approvals
				EN 14893:2006 + AC:2007	Between 1 January 2009 and 31 December 2016	
				EN 14893:[ <b>2013</b> ]	Until further notice	

2 <sup>nd</sup> su	N 12493 bmission 286151	LPG Equipment and accessories – Welded steel tanks for LPG – Road tankers, design and manufacture	Where to refer in ADR 6.8.2.6.2	Applicable sub-sections and paragraphs: 6.8.2.4 and 6.8.3.4	
Assessm	ent from CEI	N Consultant not yet provided.			
Comme	nts from me	mbers of the Joint Meeting:			
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
D1	6.8.2.1.17	The non compliance of this standard with 6.8.2.1.17 ADR (calculation example from Germany on the last Joint Meeting) was solved with the slight changes in the formulae D.1 and D.2 in this case. How is it guaranteed that for all possible material grades of the tank shell the minimum ADR shell thickness according to 6.8.2.1.17 is met?		To the judgment of the Consultant the wall thickness requirements of the standard are at least equivalent. As shown by the calculations provided.	WG appreciates the calculations provided by J. Williams and supports that this document is provided to the WG members. It shows that the minimum wall thickness for all steels and all 19 grades of steel referenced in the standard, tank diameters from 1,0 – 2,5 m and 12 different test pressures from 1,0 – 3,0 bar .is at least the as big as required by RID/ADR.  Final conclusion to be agreed at the Joint Meeting session in September.

Decision of the STD's WG:	Prelimi- nary	nary accepted	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
	accepted		Comment from France: Because the JM decided to limit the application of this standard, the date in Table of 6.8.2.6 of ADR 2013 is $31/12/2013$ for new type approval which means there is a gap in 2014, new construction will be only possible based on existing type approval.  Final conclusion to be agreed at the Joint Meeting session in September.		
			EN 12493:2001 (except Annex C)	Between 1 January 2005 and 31 December 2010	31 December 2012
			EN 12493:2008 (except Annex C)	Between 1 January 2010 and 31 December 2013	31 December 2014
			EN 12493:2008 + A1:2012 (except Annex C)	Until 31 December 2013	31 December [2014 ???]
			EN 12493:[ <b>2013</b> ]	Until further notice	

	FprEN 14140 2 <sup>nd</sup> submission WI 286127	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	
Assessment from CEN Consultant not yet provided.					

Comme	nts from me	mbers of the Joint Meeting:			
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
D7	general	The impression has risen that the requirements does not content all aspects given in M 247 or as explained in/2013/43. Since the requirements are not concentrated in annex B this cannot checked easily.	Will the standard still be acceptable after integration of the M 247 into the RID/ADR?		The WG is aware of the fact that the M 247 agreement is related to the periodic inspection of the overmoulded cylinders and thus with EN 1440 but not with EN 14140. It confirms, however, that the requirements in both cylinders shall fit together and comply with all relevant provisions of RID/ADR, the applied amendments included. There is seen no obvious regulation in FprEN 14140 contradicting this principle.
CEN TDG Consultant 1		The reference to "ambient temperatures" is questioned as long as there is no clause on the design temperature limits.	Check the need for this part of the scope. A clause on the design temperature limits is required for the design of the steel cylinder and may also be relevant for the selection of plastics (overmoulding) materials.		The Group takes note that this comment has been accepted by CEN/TC 286/WG 1. (design for a temperature range of -20°C - +65°C)
CEN TDG Consultant 2		The phraseincluding coated, protected overmoulded cylinders may be seen as conflicting with definition 3.1.3	Editorial – To be considered at TC level.  Suggest part to read:  including coated cylinders, protected over-moulded cylinders and cylind for hot air balloons.		l ded cylinders and cylinders

CEN TDG Consultant 3		The water capacity range is given with 0,5 l up to and including 150 l. However, it is understood that the water capacity of protected over-moulded cylinders is limited to 12,8 l.  (Hot air balloon cylinders may also limited in capacity smaller than 150 l).	Add the volume limits for protected over-moulded cylinders to either to clause 3.1.3 or to clause 5.10.	The Group takes note that this comment has been accepted by CEN/TC 286/WG 1. (13 l as used in ECE/TRANS/WP.15/AC. 1/2013/43).	
D 1	3.1.3 7.3.7.3	It is not appropriate to use the term "protected" in the name of a kind of pressure receptacle. This is not a really neutral description of the design and seems to include aspects of marketing.	"Over-moulded cylinder" enables already a clear differentiation from other designs and should be therefore sufficient.	ed at TC level.	
CEN TDG Consultant	3.1.10	From the three options the option - removable with special tools – seems not to be dealt with in the standard.	Check the need of this option.	The Group was informed that all three options are needed and are used in practise.	
CEN TDG Consultant 5	5.1.1	The use of "yield stress" as the basis of calculation is wrong.	Editorial – To be considered at TC level.  Replace by "yield strength".		
CEN TDG Consultant 6	5.1.3, Note	P200, Table 2 includes test pressures, no vapour pressures	Editorial – To be considered at TC level.  Replace "vapour pressure" with "test pressures".		

D 2	5.7	Valve protection: It is not acceptable to ask for different requirements for different uses if the purpose is to ensure same safety.	Independent from the purpose of a cylinder it has to fulfil the same RID/ADR safety level.  If there are differences necessary they should be explained and mentioned in the relevant annex. (C)		It was explained that hot air balloon cylinders are subject also to Regulation (EU) No 748/2012. The Group accepts that valve protection is regulated differently for different types of cylinders but always compliant with RID/ADR.
CEN TDG Consultant 7	5.7, 2 <sup>nd</sup> paragraph.	It is understood that the valve protection of protected over- moulded cylinders is provided by its casing. However, this isn't clear in the standard. Clarification is required.	Add a note after the 2 <sup>nd</sup> NOTE This applies also moulded cylinders.		The Group takes note that this comment has been accepted by CEN/TC 286/WG 1.
D 3	5.10 and 7.3.7	It is not understandable why the over-moulded cylinders are touched in 5.10, 7.3 or other parts of the standard while there is a special annex dealing with this kind of cylinders.	Put all relevant requirements together by deleting annex B or moving all relevant parts to annex B.	Editorial – To be considered at TC level.	
D 4	6.7.4	It is not understandable why air ballooners' cylinders are touched in 6.7.4 or other parts of the standard while there is a special annex dealing with this kind of cylinders.	Put all relevant requirements together by moving all relevant parts to annex C.	Editorial – To be considere	ed at TC level.
CEN TDG Consultant 8	7.2 and 9.8	RID/ADR 6.2.1.5.1 (f) requires the verification of the conformance with the design standard (to my mind the type approval) as part of the batch testing.  This seems of particularly important if the production is split onto different manufacturers	This item should becon clause 9.8 as an additio	ne part of 7.2, Table 2 and nal item.	The Group takes note that this comment has been accepted by CEN/TC 286/WG 1.
UK 1	7.2	Editorial correction and suggestion for end of first paragraph	in accordance with clause 8 and clause 9. The applicability of the tests is shown in Table 2.	Editorial – To be considere	
D 5	7.3.7.2	The heading "Un-coating" leads to misunderstanding (compare "UN-cylinders").	Please use "non-coated"	Editorial – To be considere	ed at TC level.

CEN TDG Consultant 9	7.3.7.3.1 and Annex B	This general design requirement for protected cylinders is too vague and not acceptable as a basis for a general application, referenced in RID/ADR.  It is understood that the design shall be capable of  - Being handled manually under transport conditions  - Being operated (easy access for filling and consumption)  - Being stacked with a specified stacking height/load  - Providing valve protection  - Preventing rain water ingress in between casing and coated cylinder  - Providing information on the conformity assessment documentation and allowing the marking with inspection markings.  These aspects are covered only partially. Annex B is useless in this respect, as it shows an example, inadequate for a normative annex	This clause and Annex to cover the aspects ind	B need fully been rewritten icated.	The Group takes note that this comment has reasonably been accepted by CEN/TC 286/WG 1.
D 6	7.3.7.3.1	Detailed requirements for the plastic moulding are missing.	Testing procedures and requirements of the plastic for moulding should be added (max. porosity, max. humidity transport, max. humidity saturation process, min. mechanical strength, min. elastic deformation, min. surface robustness)	Agree.	More information on essential properties of plastics material awaited: Discussion postponed.  Final conclusion to be agreed at the Joint Meeting session in September.

CEN TDG Consultant 10	7.3.7.3.1	Polyurethane is available in a broad variety of properties which would show different results in the required impact tests. To allow "materials with equivalent properties" is unacceptable neither.  The selection of unsuited material could show negative long-term effects (such as water ingress, loss of mechanical properties, accelerated ageing) despite positive results in the required performance tests.  Equivalent materials may only be allowed if the designer can compare values. If there are no values, the equivalency cannot be determined.	(plastics foam) need to References to material: It seems that at least ad "rigid (or semi-rigid), c	ditional criteria such as losed- porous polyurethane density (or compression/ need to be added. cation of protected	
UK 2	7.3.7.3.1 1 <sup>st</sup> paragraph	These are merely objectives and are insufficient for a standard and Annex B is also too vague.	At least the properties of the polyurethane shall be specified since this is the equivalence criterion for other coatings	Agree.	
UK 3	7.3.7.3.1 4 <sup>th</sup> paragraph	The requirement for competent authority approval is not acceptable. The purpose of having a standard in the regulations is to avoid state-by-state approval.	The standard must fully specify the acceptance criteria.	Agree. Shall become subject to an amendment of RID/ADR	These comments relate to a clause of an older version of prEN 14140
UK 4	7.3.7.3.1 6 <sup>th</sup> paragraph	The setting of criteria by the manufacturer is also not acceptable.	Acceptance criteria to be included in the standard	Agree. Not consistent with related clauses of metal cylinders.	which been deleted. They are no longer relevant, therefore.
UK 5	7.5.1	The use of the word fluid (means liquid or gas) and the note imply that this test could be carried out using a gas. This is not only extremely dangerous, it would cause fragmentation of the cylinder and the measurements required would be very difficult. The requirements are written for a hydraulic burst test and the	Change fluid to liquid and delete the note about testing with a gas.	Agree. Gas as a test medium would not allow a judgment of the type of fracture (no fragmentation!) as required in Clause 7.5.1.2.3.	The Group agrees that the clause needs to be revised, as suggested.
D 9	7.5.1.1.13 Note	Batch and especially burst tests with gas are not acceptable!	The place of the Note might be wrong	Agree.	

CEN TDG Consultant 11	8.1, 1 <sup>st</sup> paragraph	My suggested wording is misprinted.	Editorial – To be considered at TC level.  Correct the sentence to read:  The compliance of any new type of cylinder with this standard shall		
CEN TDG Consultant 12	8.1.7 – 8.1.9	Grammar. All these clauses require the performance of several tests, not only one test.	Editorial – To be considered at TC level.  It is suggested to rephrase the texts similar to:  The resistance against external corrosion shall be tested in accordance with 7.12.  The resistance against mechanical impact shall tested in accordance with 7.13		
CEN TDG Consultant 13	8.2	Heading and text are not self- reading.	Editorial – To be considered at TC level.  It is suggested to amend the title tom read:  Design type variations and to add the following general clause:  The design type specification may include the following parameters for which the type test results are also valid and which will be covered by the design type approval.		
CEN TDG Consultant 14	9, Heading and structure	The wording of this Clause is not compliant with RID/ADR, using the term "Initial inspection and tests"	Amend the title to read:  Initial inspection and tests	Supported	
CEN TDG Consultant 15	10.2	This clause isn't compliant with RID/ADR which require in that certification, operational and manufacturing marks shall permanently be marked clearly and legibly on the shoulder, top or neck of the pressure receptacle.  It is understood that these marking provisions are intended to be amended to allow the marking scheme for protected over- moulded cylinders. As long as such an application hasn't been adopted by the regulators, the standard isn't compliant with RID/ADR.  The wording also deserves improvement (split into several sentences,)	This clause needs to be reviewed under consideration of the decisions of the Joint Meeting on this issue.	Comment withdrawn considering the opening clause in RID/ADR 6.2.3.9 which allows marking "on a permanently affixed component of the pressure receptacle (e.g)"	

CEN TDG Consultant 16	10.4	The wording could be improved to avoid the non-compliant term "pressure envelope".	Editorial – To be considered at TC level.  Suggest to write:  Where the stamp marking is directly applied of the steel cylinder		
UK 6	11.1	The wording of this clause is unclear. Is it a requirement of this standard that these rejection limits shall be determined? If it is not, this clause is only giving information and should be presented as a note.	Make 11.1 a note after the requirement in 11.2	Agree. Clarification required.	This comment relates to a clause of an older version of prEN 14140 which been deleted. It's no longer relevant, therefore.
CEN TDG Consultant 18	12, 2 <sup>nd</sup> paragraph	This paragraph relates to clause 8.1 – Technical requirements for type approval – General and should be placed there.	1		Editorial – To be considered at TC level.

	Annex B	1. It is generally questioned whether the example of	Review Annex B.1 as in	ndicated	The Group takes note that
	Ailliex D	<ul> <li>a design in form of a picture can be normative.</li> <li>The second paragraph including the indents is related to the marking of the cylinder and be placed under clause 10. The sub- heading B.1 - Design is misleading, anyway.</li> </ul>	Review Aimex D.1 as ii	ndicated.	this comment has reasonably been accepted by CEN/TC 286/WG 1. The Annex will contain detailed requirements on electronic information.
ınt 19		3. It is not determined who shall set up and maintain this database (over long periodic inspection times) and on which basis the owners, customers, filling stations and inspection bodies have access to it.			which justifies that this Annex remains normative. The group
Consul		4. Its contents would better be integrated in the main text of the standard.			recommends that this clause on electronic
CEN TDG Consultant 19		5. Procedures to prevent water ingress shall be added to the standard, if there are some available.  Otherwise this sentence is useless and shall be deleted.			information is distinguished from the rest of the Annex by a separate heading.
		6. The last sentence is related to clause 6 and shall be found there.			
		7. The picture shown in B.1 may be declared as an example of a protected over- moulded cylinder design in an <u>informative</u> annex.			
		8. Mind that No 9 is not showing "identification marks" but the Class2 hazard label.			
D 8	Annex C	It is not acceptable in RID/ADR to approve future cylinders for air ballooners without fulfilling the full set for transport of dangerous goods. We have to expect that each cylinder that is approved in accordance with EN 14140 fulfil the requirements of RID/ADR and the full set of tests given in EN 14140. In consequence these cylinders cannot be excluded from the commercial transport of LPG in principle. The relevant sentence gives no clear guidance.	The relevant sentence should be deleted if these cylinders are in full compliance with EN 14140 or these cylinders shall be excluded from the reference of EN 14140 in RID/ADR.	Annex C may be exempt in the reference text as it may not fall under the TDG legislation.	The Group feels satisfied by th specific marking requirements in Clause 10.3.
OG ant	Biblio- graphy	Literature [12] isn't used in the standard.	Editorial – To be consid		<u>'</u>
CEN TDG Consultant 20	Erapity	Literature [13] is referenced in clause 10.4, Note 1, as "[12]".	Delete literature [12] and amend "[13]" to read "[12]".		

Decision of the STD's WG:	Accepted	Additional comments	Proposed transition regulation		Latest date for withdrawal of existing type approvals
			EN 14140:2003	Between 1 January 2005 and 31 December 2010	
			EN 14140:2003 + A1:2006	Between 1 January 2009 and 31 December 2016	
			EN 14140 [ <b>2013</b> ]	Until further notice	

<b>FprEN 14334:2013</b> 2 <sup>nd</sup> submission WI 286130			ment and accessories – Inspection and sting of LPG – Road tankers	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		
Assessm	Assessment from CEN Consultant not yet provided.						
Comme	nts from me	mbers of the J	Joint Meeting:				
Country	Clause No.	Con	mment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards	
UK 1	5.2	Type approva as given in A	al documentation should also be available DR 1.8.7.7.		Agree.	Agreed	
UK 2	5.8.8	The acceptability of this clause will depend upon the Joint Meeting's decision on the AEGPL paper 2013/41.			Yes, this issue is still pending.	To be awaited. Final conclusion to be agreed at the Joint Meeting session in September.	
Decision of the STD's WG:		Postponed	Additional comments			No transition regulation required	

FprEN 14427:2013 LPG Equipment and accessories – Trans refillable fully wrapped composite cylind LPG – Design and construction	
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Assessment by CEN Consultant on 23.7.2013 (to be dispatched).

Summary of conclusions

FprEN 14427 is compliant with the relevant provisions of RID/ADR and can be approved, provided that the agreed amendment of the test regime asking both test samples to be burst tested is implemented prior to publication. All comments of the Standards Working Group and of my enquiry draft assessment will then have been addressed adequately.

Follow-up action by the Joint Meetings STD's WG

This standard needs to be discussed by the STD's WG as an amendment of the existing references to EN 14427:2004 and EN 14427:2004+A1:2005 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. Notes 1 and 2 are not needed for the new issue of the standard.

Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK	Gen	No comments			
CEN TDG-Consultant 8	5.2.9.2.1 and 5.2.9.3.1, paragraphs starting with "On completion of"	It is considered illogic that the first paragraph ask to examine only one cylinder and the second paragraph requires "if both cylinders show damage"  In addition it is recalled that both of the damaged cylinders shall undergo the burst test acc. to RID/ADR (see Note 2 to the reference to EN 14427:2004 + A1:2005 in the table of &.2.4.1).  The comments resolution document N1402 has accepted this change. However, it wasn't implemented in the FV draft.	Amend the first paragra On completion of be cylinders shall Amend the second para Where/ If both cylinder worse than these rejecticylinders shall be subjet accordance with Test N	oth impacts, the graphs to read: s show damage equal or ion criteria, then both ct to a burst test in	Supported.  Has been corrected in the final text.

Decision of the STD's WG:	Accepted	Additional comments	Proposed transition regulation	Applicable for new type approvals or for renewals	Latest date for withdrawal of existing type approvals
			EN 14427:2004  NOTE: This standard applies only to cylinders equipped with pressure relief valves.	Between 1 January 2005 and 30 June 2007	
			EN 14427:2004 + A1:2005 NOTE 1: This standard applies only to cylinders equipped with pressure relief valves. NOTE 2: In 5.2.9.2.1 and 5.2.9.3.1, both cylinders shall be subject to a burst test when they show damage	Between 1 January 2007 and 31 December 2016	
			equal to or worse than the rejection criteria.  EN 14427:[2013]	Until further notice	

### C. Standards at Stage 4: Published standards

Dispatch 2

EN ISO 13088:2012 Gas cylinders - Acetylene cylinder bundles - Filling conditions and filling inspection (ISO 13088:2011)	Where to refer in RID/ADR/ADN: 4.1.4.1, P200(11)	Applicable sub-sections and paragraphs: 4.1.4.1, P200(10) p
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Assessed by CEN Consultant on 18.2.2013 (Dispatch 2)

Summary of conclusions

There are no contradictions between EN ISO 13088:2012 and the relevant provisions of RID/ADR. However, further alignment with these provisions is recommended, as well as a few improvements.

Follow-up action by the Joint Meetings STD's WG

This standard needs to be discussed by the STD's WG as a replacement of EN 12755, referenced in RID/ADR 4.1.4.1, P200(11) and in 6.2.3.9.7.2.

Comme	nts from me	mbers of the Joint Meeting:			
Country	Clause No.	Comment (justification for change)	Proposed change	Comment from CEN Consultant	Comment from WG Standards
UK1	Gen	This standard is an ISO standard published in 2011 adopted by UAP so no modifications are possible until ISO decide to revise it.	None	or to lounge an amendment if considered urgent.	
UK2	Gen	Harmonisation with UN of bundle marking will render obsolete the reference to EN 12755 which is replaced by ISO 10961:2010, (not by this standard).	This standard to be referenced in P200 (11) only	In fact, the draft proposal of the ad-hoc WG Harmonization (ECE/TRANS/WP.15/AC .1/2013/31/Add.1) includes this amendment (see amendment to 6.2.3.9.7, page 57).	It is agreed that reference shall be made in P200(11), only
RID/ADR require that cylinders for UN No. 1001 acetylene, dissolved: fitted with pressure relief devices or manifolded together shall be carried vertically. This requirement is equally found in the UN Model regulations.  The condition isn't included this requirement.  UK 3: The requirement for cylinder with PRDs and manifolds to be carried vertically is a carriage		Amend the definition to vertical orientation of the	o include the aspect of the he cylinders.	Consultants comment withdrawn following feedback from UK and EIGA – resolved.	
CEN TD		<b>UK 3:</b> The requirement for cylinder with PRDs and manifolds to be carried vertically is a carriage requirement and not a filling requirement – i.e. it is out of scope of the standard.	This requirement has carried over into P200 from the UN where there is no other place for it. It should appear in 7.5.11 in ADR/RID as a CV or CW respectively.		

CEN TDG-Consultant 4

The limitation of the maximum acetylene content is seen as a critical safety issue and the responsibility for its specification shall clearly be regulated. The term "manufacturer" in this context is ambiguous and requires further consideration.

Reconsider the addition of a definition for "manufacturer" and the addition of the option that the maximum contents may regulated in the type approval for the bundle.

The Group agrees that the standard should be improved in this respect.

It seems that the person responsible for the marking of the bundle takes the responsibility for all details indicated, the maximum acetylene contents, included.

needs to relate to the responsibility for the specification of the maximum acetylene contents. It is understood that this "manufacturer" shall be marked on the identification plate acc to clause 5.2 b).

As the bundle is subject to a type approval it could well be that the approval authority may determine the maximum contents. This option should also be considered.

UK 4:ISO 10961 defines "bundle manufacturer use in all jurisdictions an unspecified 'manufacturer' provides the information, but he may not have decided it.

No change – in the pursuit of harmonisation.

entity that assembles the various components of the bundle into its final configuration". Although ISO 10961 covers the mass of acetylene in the type approval, this is not the case except for ADR/RID/UN pressure receptacles. Since this standard is intended for

Decision STD's V		available to  Again, this jurisdictions		No change – in the pursuit of harmonisation.	in RID/ADR 6.2.2.10.  Once adopted, the standard may then need to be assessed for compliance with these new marking provisions.  At this occasion the Group realizes that the existing marking provisions for non- UN bundles and the new ones for UN bundles fail to include marking elements for the periodic inspection, similar to the ones for cylinders in 6.2.3.9.1/6.2.2.7.7.  No transition regulation required
	5.2	marking pro appear in the Regulations. Neither all e	is closely related to the new RID/ADR visions as in 6.2.3.9.7, which will also e next edition of the UN Model . elements of these marking provisions are nor its required grouping.	Align clause 5.2 with the marking provisions of RID/ADR 6.2.3.9.7.	The Group takes note of the intended amendment of 6.2.3.9.7 as indicated in the reaction to UK 2, above, which will refer to new marking provisions for UN bundles of cylinders

#### General purpose standard

FprEN <b>590:2013</b> Draft 2013-06	Automotive fuels – Diesel – Requirements and test methods	Where to refer in RID/ADR:	Applicable sub-sections and paragraphs:
WI 286120			

CEN Consultant: EN 540:2004 is referenced in RID/ADR 3.2.1 Table A, 4.1.1.19.6 and 9.1.1.2 a) to specify Diesel fuel and Heating oil, light, and to specify its flash-points.

The foreword of the revised standard indicates a number of technical changes compared with the previous edition (EN 590:2009+A1:2010) which seem to have no impact on the TDG classification scheme and agreed methods for the establishment of the flash-point.

With respect to the **reference in the assimilation list** (RID/ADR 4.1.1.19.6) it may be that the addition of blends of automotive diesel fuel containing 10% (V/V) or higher of different sources of fatty acid methyl esters (FAME) will need to amend the related standard liquid (mixture of hydrocarbons). This needs **to be checked by the experts for plastics packaging compatibility testing**.

#### **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	Gen	No comments			See line below.

The WG confirms that the revision of this standard with respect to the optional addition of FAME has impact on the standard liquid related to the entry Diesel fuel in the assimilation list and that amendments are needed. It was informed that investigations performed by BAM, Germany, have shown the need for such an amendment.

The WG expects that an application for amendment will be submitted by Germany for the next session.