



**INF. 32**

9 March 2020

Original: English

## **RID/ADR/ADN**

Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods (Bern, 16 - 20 March 2020)

### **Item 2 of the agenda: Tanks**

#### **Comments on informal document INF.31: Chapter 6.2 – Amendment concerning the proposals made by the informal working group on the inspection and certification of tanks**

#### **Submitted by Germany**

### **Introduction**

1. The informal working group on the inspection and certification of tanks met from 12 to 14 June 2019, from 10 to 11 July 2019 and again from 11 to 13 December 2019 and has submitted amendments to 1.8.6 and 1.8.7 in conjunction with Chapter 6.8 (see document 2020/20).
2. The proposed amendments to 1.8.6 and 1.8.7 also have an impact on Chapter 6.2, as this chapter draws on the provisions of sections 1.8.6 and 1.8.7. Thus, amendments to Chapter 6.2 are also necessary.
3. These consequential amendments to Chapter 6.2 go beyond the amendments that only concern tanks. Therefore, Germany has agreed to submit these amendments in a separate document.
4. Informal document INF.31 details the changes to align the text with the conclusions of the informal working group and working group on tanks.

5. However, the proposed text requires a type B body to work exclusively for a filler of receptacles, which, in Germany's opinion, is too strict. It had been argued by France that this kind of binding relationship was intended in the first TPED directive for the predecessor of type B bodies. After verification of the original text, it was not the filler, but the owner or holder of receptacles for which a body was allowed to work exclusively. Therefore, the existing proposal should be amended.
6. In addition, the reference to "its receptacles" might be misinterpreted, especially when translated into other languages, because this could also mean that the receptacles have to be owned by the type B body. A modification is therefore proposed.

## Proposals

7. Germany therefore proposes that Chapter 6.2 be amended as follows:

**6.2.2.11** Amend the second sub-paragraph after the table as follows:

- Replace "a filler" by:  
"an owner or holder".
- Replace "to perform periodic inspections of its receptacles" by:  
"to perform periodic inspections of the receptacles of the owner or holder".

**6.2.3.6.1** Amend the third sub-paragraph after the table as follows:

- Replace "a filler" by:  
"an owner or holder".
- Replace "to perform periodic inspections of its receptacles" by:  
"to perform periodic inspections of the receptacles of the owner or holder".

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