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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 documents ECE/TRANS/WP.15/AC.1/2020/19 and ECE/TRANS/WP.15/AC.1/2020/20

Submitted by the International Union of Wagon Keepers (UIP)

Introduction

1. UIP supports the United Kingdom's activities in connection with the working group on the certification and inspection of tanks, in which UIP was also actively involved.
2. However, UIP would like to point out that the current situation regarding the mutual recognition of approvals and inspections in ADR and RID differs quite considerably:

Ten years ago, RID implemented regulations and procedures in Chapter 6.8 to support and simplify the international operation of railway vehicles. As a result, it is possible and is usual practice that tank inspections can always be carried out by

- inspection bodies recognised by the country of the inspection of the tank or
 - inspection bodies recognised by the country of registration of the tank.
3. Even the mutual recognition of approvals (i.e. accepting RID approvals by other OTIF Member States) when registering a rail tank-wagon is widely practised.

4. In addition, in 2019 the EU implemented the European authorisation of railway vehicles by ERA as part of the 4th Railway Package under title "One-Stop-Shop".
5. As a result of this situation, UIP would like to make some general remarks on the current proposal and some RID-specific remarks that might to be discussed further in the RID Committee of Experts' standing working group after a final basic text has been agreed by the Joint Meeting.

Initial and periodic inspections of tanks

6. During the last discussion of this work item at the Joint Meeting in September 2019 in Geneva, it was pointed out that this issue would be dealt with more specifically when the new, so-called "entry into service verification" is required by the authorities.
7. The current proposal now implements the concept of: "reciprocal recognition", but this might lead to discussions again, because due to the wording in Chapter 6.8, the
 - inspection bodies recognised by the country of the inspection of the tank or
 - inspection bodies recognised by the country of registration of the tankmust be deemed as "mutually agreed", with no further requirement, except that these bodies are to be listed at OTIF/UN.
8. UIP proposes to add wording similar to the current wording regarding extraordinary inspections in Chapter 6.8:

"Such an entry into service verification can be required by the competent authority if there are doubts regarding conformity with RID/ADR."

Approval of tanks

9. Following the same logic as for inspections, it should be made clearer that approvals issued by the competent authority of the manufacturing country (RID/ADR) are always to be recognised when registering a tank abroad. Particularly with the newly implemented, so-called "entry into service verification", there is a risk of a misunderstanding that in these cases, when registering in different country, an "entry into service inspection" must always be carried out. In our view, this was never the intention of the working group, which should be confirmed.

Remarks specific to RID

Mutual recognition of approvals

10. Even with this wider scope of recognition as described above, the situation in RID is not harmonised with procedures in the European approach for the authorisation of wagons by ERA. Even though ERA has already announced that it will accept all valid tank approvals when "authorising a vehicle", Member States might require additional local procedures during the registration process.

Transitional measures

11. The wording now being proposed does not reflect the current situation in RID, according to which there are inspection bodies notified to OTIF that are recognised under national procedures and are not necessarily accredited according to EN 17020. With regard to this situation, RID-specific transitional measures are required for inspection bodies currently acting on the basis of national systems.