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COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS (Twenty-first session, 4-13 December 2000 agenda item 2 (a))

WORK OF THE SUB-COMMITTEE OF EXPERTS ON THE TRANSPORT OF DANGEROUS GOODS

Developments of provisions for the transport of gases

Comments on 2000/22, Proposals for 6.2.2.5 Quality Conformance

Transmitted by the expert from the United Kingdom

1. In paper 2000/22 text has been included for the first time on 'quality conformance'. This is indicated by the text being in square brackets, highlighting the fact that the Gases Working Group has not previously discussed this proposal in detail. Whilst recognising the need to include provision for quality assurance in respect of the manufacture and inspection of pressure receptacles, the expert from the United Kingdom finds the current proposal to be unduly detailed and proscriptive. It seems likely to generate extensive debate which may not achieve consensus during the current meeting of the Committee of Experts.
2. Requirements for quality assurance systems can already be found in other parts of the Model Regulations. For example, in 6.1.1.4 and 6.5.1.6.1 in respect of the manufacture and testing of packages (other than for Division 6.2 substances) and IBCs. In 1.1.2.3 quality assurance provisions for all special form radioactive material, low dispersible radioactive material and packages can be found. These provisions were first introduced by IAEA in 1973 for packages and reviewed and extended in the 1985 IAEA Regulations. They have thus stood the test of time. The expert from the United Kingdom believes that, given the special sensitivities associated with radioactive material, this text thus serves as a good model for similar provisions addressing pressure receptacles.
3. The expert from the United Kingdom proposes therefore that suitably modified text based on 1.1.2.3 should be included in Chapter 6.2.2.5. Such text is given in the proposal below, which highlights the changes made to the current text of 1.1.2.3. It is requested that the Committee agree this approach which would then permit the Gases Working Group to concentrate on other issues remaining to be resolved. It is questionable whether it is appropriate to apply these provisions to users. This is shown in square brackets and could be discussed by the Gases Working Group.

Proposal:

Insert new 6.2.2.5 as follows:

~~1.1.2.3~~ 6.2.2.5 Quality Assurance

~~1.1.2.3.1~~ 6.2.2.5.1 Quality assurance programmes based on international, national or other standards acceptable to the competent authority shall be established and implemented for the design, manufacture, testing, documentation, use, maintenance and inspection of all ~~special form radioactive material, low dispersible radioactive material and packages for transport and in transit storage operations~~ ***UN certified pressure receptacles*** to ensure compliance with the relevant provisions of these Regulations. Certification that the design specification has been fully implemented shall be available to the competent authority. The manufacturer ***or*** consignor ~~for~~ ~~user~~ shall be prepared to provide facilities for competent authority inspection to demonstrate to any cognizant competent authority that:

- (a) the manufacturing methods and materials used are in accordance with approved design specifications; and
- (b) all ~~packagings~~ ***UN certified pressure receptacles*** are periodically inspected and, as necessary, ~~repaired and~~ maintained in good condition so that they continue to comply with all relevant requirements and specifications.

Where competent authority approval is required, such approval shall take into account and be contingent upon the adequacy of the quality assurance programme.
