ORGANISATION INTERGOUVERNEMENTALE POUR LES TRANSPORTS INTERNATIONAUX FERROVIAIRES



OTIF

ZWISCHENSTAATLICHE ORGANISATION FÜR DEN INTERNATIONALEN EISENBAHNVERKEHR

INTERGOVERNMENTAL ORGANISATION FOR INTER-NATIONAL CARRIAGE BY RAIL

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- **RID:** 41st Session of the Committee of Experts on the Transport of Dangerous Goods (Meiningen (Germany), 15 18 November 2004)
- Subject: 6.8.2.4.6 Expert for performing tests and inspections on the tanks of tank wagons

Proposal transmitted by Switzerland

The last sentence of the new 6.8.2.4.6 in the 2005 edition of RID (Experts for performing tests and inspections on the tanks of tank wagons) reads as follows:

"In order to ensure a uniform level of inspections, the secretariat of OTIF shall arrange an exchange of experiences at least once every year."

Switzerland is of the view that there is indeed a need for a "uniform level of inspections", but there should be an in-depth discussion on how this aim can be achieved. Subsequently, proposals for clarifying the text should be drafted.

According to multilateral special agreement RID 4/2002, which makes it possible for the signatory States to implement in advance the mutual recognition of experts for performing tests and inspections on tank wagons, Germany, the State which initiated this special agreement, will be responsible for organizing the exchange of experiences. Switzerland has signed the special agreement and in December 2003, took part in a meeting in Bonn. Those attending the meeting indicated the areas in which it would be desirable to harmonize the test and inspection procedures. In Switzerland's view, regular exchange of experiences is essential for the harmonized practice of test procedures, but it is not sufficient.

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Because:

- How can the level required of the expert defined in 6.8.2.4.6 be maintained? How can a check be kept on the market?
- How can it be ensured that experts apply the same acceptance criteria, thus avoiding less stringent test and inspection procedures leading to "tourism", whereby wagons are taken to more conciliatory test centres?
- How can one prevent a tank wagon that has been rejected by one expert being approved by another?

Example:

A Swiss expert inspects the minimum wall thickness of a tank wagon and measures values of less than the prescribed 6 mm over an area which he considers too large to be approved as a derogation. He refuses to provide the stamp passing the inspection. The wagon owner requests an inspection by an expert in a neighbouring State, where tolerance values of up to -10% of the prescribed minimum value are permitted. How can a distinction be made between the owner's right to request a second measurement of the wall thickness – if he has doubts concerning the first expert's competence – and the wish to have the wagon inspected by a less scrupulous expert?

The same goes for repair methods, which differ greatly in the various States, when the tank does not conform to the provisions. Proof of this is provided by the example of repairs carried out using plating (doubling the plates), which is a standard repair in some States and is prohibited in others.

Some solutions:

To Switzerland, it seems absolutely essential that in noting a problem during the test and inspection of the internal and external condition of a tank, the experts in all the Member States should apply identical acceptance criteria. Thus:

- Should not a catalogue of common criteria be produced, to be used by all experts? This would cover, in particular:
 - 1. An assessment of corroded surfaces (surface affected and thickness measurement)
 - 2. Tank repair methods.
- Would it be conceivable to require all experts to notify the Secretariat of OTIF (or another central body) of the identity of wagons whose test and inspection could not be endorsed?
- Can this body be requested to make this information available to the other experts?
- Can the experts be required to ask for this information before tests and inspections are carried out?

Switzerland would like to hear the views of other delegations and will, if the RID Committee of Experts supports this approach, submit a proposal.