



OTIF/RID/CE/GTP/2020/2

12 October 2020

Original: English

RID: 12th Session of the RID Committee of Experts' standing working group
(Video-conference, 24 to 26 November 2020)

Subject: Request for clarification on tank approval and putting tanks into service
after construction/maintenance

Proposal transmitted by the International Union of Wagon Keepers (UIP)

1. In connection with the implementation of the 4th Railway Package and the new vehicle authorisation procedure for freight wagons, the authorising entity requires the final inspection certificates for the tank, together with the application files for the authorisation of a tank-wagon. Unfortunately, tank approval certificates are only issued a couple of days or weeks after the tank has been produced and inspected. This results in costly delays for the authorisation of tank-wagons.
2. Based on many years of operational experience and taking into account that the "operator" is the person responsible in this process, UIP considers that a tank that has passed inspection and has been appropriately marked/stamped by the inspection body can be put into service straight away.
3. The RID tank approval certificate does not contain any relevant information in addition to what is already shown on the stamped tank plate. Pictures of the stamped tank plate can therefore be considered as adequate evidence for the authorising entity (ERA) to be reasonably assured that the applicant and the certification body have both performed their duties.
4. UIP therefore considers that checking the subsequently issued certificate for possible conditions and archiving it in the tank file is a downstream administrative process which has no effect on putting the tank into operation. Later on, the technical file can be updated with the certificates (once available) as requested by the Interoperability Directive (2016/797) and as part of the configuration management duty required by Commission Implementing Regulation (EU) 2018/545.

5. Against this background, UIP requests confirmation that this practice, which has been applied over many years, is acceptable.
6. Thank you for your support in resolving this very important issue for our sector.
