



OTIF/RID/CE/GTP/2020/9

30 October 2020

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

Subject: Comments from UIP on document OTIF/RID/CE/GTP/2020/4 concerning the entry into service verification of tank-wagons

Transmitted by the International Union of Wagon Keepers (UIP)

Introduction

1. More than 15 years ago, at the instigation of UIP and taking into account the international character of rail transport, RID 6.8.2.4.6 introduced common requirements for inspection bodies and their experts and agreed on a system for the mutual recognition of these inspections. Accordingly, the inspection bodies and their experts must be listed at the OTIF Secretariat and a wagon keeper/manufacturer may either appoint an inspection body from the country of registration or the country of manufacture/testing without the need for further enquiry/authorisation. This procedure was and is used extensively in the tank-wagon sector and to UIP's knowledge, has not led to any problems in the past.
2. In addition, with the implementation of the 4th Railway Package in the EU, a European vehicle authorisation procedure was created, in which ERA, as the authorising entity, checks the existence of a valid RID approval, which in turn becomes part of the wagon authorisation.
Registration – at least in the EU countries – therefore remains a merely administrative act, meaning that registration is carried out without any further checks or inspection procedures.
3. In the much more national markets for road vehicles, it is proposed for ADR to introduce an "Entry into Service Verification" as a new type of inspection.
4. As already stated in the document from the OTIF Secretariat, the RID/ADR/ADN Joint Meeting's working group on tanks is of the opinion that such an inspection might be introduced as an option in the sense of 1.8.1.1, but should not be introduced as regular inspection. The informal working group on the inspection and certification of tanks will try to improve the wording at its next meeting.

5. For these reasons, UIP would like to ask the standing working group for its opinion regarding a specific proposal for RID and on the following questions:

- When such a verification is required?
- What to do with regard to European Railway Legislation?

Proposal

6. Reword the Note proposed for 6.8.1.5.5:

~~"NOTE: The competent authority shall respect reciprocal recognition agreements between RID contracting states, when considering Entry into Service verification."~~

"NOTE: As an instrument of market surveillance in the sense of 1.8.1.1, the authority of the country of registration may request this inspection/verification if there are doubts about conformity.

For those tank-wagons that have received a vehicle authorisation from the European Union Agency for Railways (ERA) in accordance with Article 21 of Directive (EU) 2016/797 and Commission Implementing Regulation (EU) 2018/545, this authorisation shall be sufficient and no further inspection shall be required to confirm the conformity of the tank for the purpose of registering it in the National Vehicle Register (NVR)."
