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6 August 2020

Original: English

Joint Coordinating Group of Experts
(Video-conference, 8 and 9 September 2020)

Agenda item 3: Review and report on the list of priority items agreed at the previous meeting (see also document OTIF/RID/CE/JCGE 2019-B/Add.1)

2 b - Vehicle authorisation process and actors involved (competent authority)

Entry into service verification

Transmitted by Belgium

Background documents from the RID/ADR/ADN Joint Meeting

- ECE/TRANS/WP.15/AC.1/2020/20
- INF.15 of the cancelled Joint Meeting in March 2020
- INF.6/Rev.1 of the Joint Meeting in September 2020 (see point 3)

Introduction

1. Belgium originally submitted informal document INF.15 for the Joint Meeting scheduled in March 2020, which was cancelled. This document was however discussed at the informal working group on the inspection and certification of tanks on 10 and 11 June 2020 (MS Teams meeting). This document is reproduced in Annex I of this document.
2. Belgium asked whether the possibility of the entry into service verification proposed in document ECE/TRANS/WP.15/AC.1/2020/20 was really necessary for tank-wagons. The proposed text is reproduced in Annex II.
3. As the RID area includes 44 contracting states, most working group participants were of the opinion that it would be safer to keep the possibility of an entry into service verification.
4. Belgium therefore proposes that the JCGE should examine how this entry into service verification could be integrated into the process of registration/transfer of registration of tank-wagons, particularly when the authorisation for placing on the market is given by ERA.

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In the latter case, the registration entity has to register the data in the EVR within 20 working days of receipt of a complete application (see Commission implementing decision (EU) 2018/1614, Annex II, 3.2.1, point 16).

5. Belgium would be grateful if countries which already have experience in applying the 4th Railway Package and which are in favour of this entry into service verification (for instance France, Netherlands) could explain how they see this new process.

**Informal document INF.15 of the cancelled RID/ADR/ADN Joint Meeting in
March 2020**

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

**Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods**

14 February 2020

Bern, 16-20 March 2020

Item 5 (b) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:
new proposals**

**Comment on document ECE/TRANS/WP.15/AC.1/2020/20 :
Supplementary information from the informal working
group on the inspection and certification of tanks: Proposed
amendments to Chapter 6.8 and to Sections 1.8.7 and 1.8.6**

Transmitted by the Government of Belgium

Summary

Executive summary:	The concept of entry into service verification is in conflict with the vehicle authorization process in the frame of the 4th railways package
Action to be taken:	Delete left column in RID 6.8.1.5.5 concerning the entry into service verification
Related documents:	ECE/TRANS/WP.15/AC.1/2020/20 : Supplementary information from the informal working group on the inspection and certification of tanks: Proposed amendments to Chapter 6.8 and to Sections 1.8.7 and 1.8.6 OTIF/RID/CE/GTP/2019-A : 11th Session of the RID Committee of Experts' standing working group (paragraphs 17 to 23)

Introduction

1. During the RID Committee of Experts' standing working group in November 2019, Belgium asked, in document OTIF/RID/CE/GTP/2019/3, the opinion (specifically for tank-wagons) of the participants about informal document INF.19/rev.1 which contains the texts proposed by the working group on the inspection and certification of tanks at the joint meeting of September 2019.

2. UIP and ERA presented informal documents INF.7 and INF.11 respectively. Both expressed concerns about the entry into service verification. They were against the inclusion of this verification in RID or wished at least to limit the scope of the entry into service

verification. For more information, see points 18 to 21 of the report OTIF/RID/CE/GTP/2019-A.

3. Therefore Belgium proposes not to introduce the entry into service verification for the tank-wagons.

4. If some participants consider that this verification is really necessary, then we propose as alternative to foresee an equivalent verification in section 1.8.1 (Administrative controls of dangerous goods).

Proposals

5. Delete left column in RID 6.8.1.5.5 (text of informal document INF.6)

6.8.1.5.5 *Entry into service verification according to 1.8.7.5*

NOTE: The competent authority shall respect reciprocal recognition agreements between RID Contracting States/Contracting Parties of ADR when considering entry into service verifications.

(ADR:) The competent authority of the country of first registration may require an entry into service verification of the tank-vehicle to verify conformity with the applicable requirements.

When the country of registration of a tank-vehicle is changed, the competent authority of the Contracting Party to ADR to which the tank-vehicle is transferred may require an entry into service verification.

~~(RID:) The competent authority of the country of first registration may require an entry into service verification of the tank-wagon to verify conformity with the applicable requirements.~~

~~When the country of registration of a tank-wagon is changed, the competent authority of the RID Contracting State to which the tank-wagon is transferred may require an entry into service verification.~~

The competent authority of the country of first registration may require an entry into service verification of the tank-container to verify conformity with the applicable requirements.

When the country of registration of a tank-container is changed, the competent authority of the RID Contracting State/Contracting Party to ADR to which the tank-container is transferred may require an entry into service verification.

Justification

6. The concept of entry into service verification is in conflict with the vehicle authorization process in the frame of the 4th railways package (one-stop-shop for the European countries).

Annex IIEntry into service verification – Proposed text in
ECE/TRANS/WP.15/AC.1/2020/20

6.8.1.5.5 Entry into service verification according to 1.8.7.5

NOTE: The competent authority shall respect reciprocal recognition agreements between RID Contracting States when considering entry into service verifications.

The competent authority of the country of first registration **may** require an entry into service verification of the tank-wagon to verify conformity with the applicable requirements.

When the country of registration of a tank-wagon is changed, the competent authority of the RID Contracting State to which the tank-wagon is transferred **may** require an entry into service verification.

The owner or operator of the tank shall engage a single inspection body approved by the competent authority of the country of registration to perform this entry into service verification. The entry into service verification shall consider the condition of the tank and shall ensure that the requirements of RID/ADR are fulfilled.

1.8.7.5 Entry into service verification

1.8.7.5.1 If an entry into service verification is required by the competent authority under 6.8.1.5.5, the owner or operator shall engage a single inspection body to carry out this inspection and shall provide it with the type approval certificate and the technical documentation specified in 1.8.7.8.4.

1.8.7.5.2 The inspection body shall review the documentation and:

- (a) Perform external checks (e.g. marking, condition);
- (b) Verify conformity with the type approval certificate;
- (c) Verify the validity of the approvals of the inspection bodies who performed the previous inspections and tests;
- (d) Verify that the transitional measures of 1.6.3 or 1.6.4 have been fulfilled.

1.8.7.5.3 The inspection body shall issue an entry into service verification report that contains the results of the assessment. The owner or operator shall present this report at the request of the competent authority requiring the entry into service verification, and to the inspection body(ies) in charge of subsequent inspections and tests.

In the event of a failed entry into service verification, the non-conformities shall be rectified and a new entry into service verification passed before the tank is used.

The inspection body in charge of the entry into service verification shall, without delay, inform its competent authority of any refusal.
