

**OTIF**



**ORGANISATION INTERGOUVERNEMENTALE POUR  
LES TRANSPORTS INTERNATIONAUX FERROVIAIRES**

**ZWISCHENSTAATLICHE ORGANISATION FÜR DEN  
INTERNATIONALEN EISENBAHNVERKEHR**

**INTERGOVERNMENTAL ORGANISATION FOR INTER-  
NATIONAL CARRIAGE BY RAIL**

**OTIF/RID/CE/2011/8**

12 October 2011

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**RID:** 50<sup>th</sup> Session of the Committee of Experts on the Transport of Dangerous Goods  
(Malmö, 21 - 25 November 2011)

**Subject:** Application of standards EN 14432 and EN 14433 listed in 6.8.2.6

**Proposal transmitted by the International Union of Private Wagons (UIP)**

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Related documents: Multilateral special agreement RID 7/2011 and  
document OTIF/RID/RC/2011/39 (ECE/TRANS/  
WP.15/AC.1/2011/39) (Germany)

### **Current situation**

1. UIP has raised the problems of several manufacturers of tank-wagons and fittings that have emerged due to the obligatory application of EN 14432 and EN 14433. Delays by the manufacturers of such fittings and questions of interpretation during the approval procedure were the reason that at the beginning of 2011, not all the fittings in operation had an approval based on the above-mentioned standards.
2. Finally, based on this discussion, multilateral special agreement RID 7/2011 was developed. This allowed manufacturers in several Member States to continue to equip new tanks up to and including 31 December 2011 with fittings that had not been approved according to standards EN 14432 and 14433 quoted in RID/ADR from 1 January 2011, but which were still subject to national approval requirements.
3. In document ECE/TRANS/WP.15/AC.1/2011/39 (OTIF/RID/RC/2011/39) of the last Joint Meeting, Germany proposed to include a text in RID/ADR 1.6.3/1.6.4. The aim of such a regulation was to create legal certainty for the further universal operation of tanks with such approvals.

For reasons of cost, only a limited number of copies of this document have been made. Delegates are asked to bring their own copies of documents to meetings. OTIF only has a small number of copies available.

4. Unfortunately, after some controversial discussions, this proposal was rejected by a narrow majority. This means that from 1 January 2012, tanks produced and put into operation under the above-mentioned multilateral special agreement have to be equipped with fittings according to the European standards referred to.
5. UIP understands this decision and recognises that in this case a multilateral special agreement was not the best solution. However, in terms of safety-relevant aspects, UIP considers this decision as unreasonably onerous and therefore asks the RID Committee of Experts to review it. After all, 8 States have signed the special agreement and there are an unknown number of wagons equipped with such fittings.

### **Justification**

6. Tank manufacturers and operators have equipped tanks in accordance with multilateral special agreement RID 7/2011 in the assumption that they would be able to continue operating these tanks after 31 December 2011.
7. At present these fittings meet all the safety requirements of the current RID/ADR (approvals based on national regulations). What is missing is the approval according EN 14432/14433, in which the test procedures are harmonised, but no new requirements are defined.
8. The retrospective fitting of tanks with fittings according to EN 14432/14433 is a considerable economic burden and does not improve safety.

### **Proposal**

9. UIP requests implementation of Germany's proposal in accordance with document ECE/TRANS/WP.15/AC.1/2011/39 (OTIF/RID/RC/2011/39) for RID and the inclusion of a transitional provision for 1.6.3 that allows continued operation of tanks whose fittings do not comply with the standards referred to.

#### **"1.6.3.x /**

**1.6.4.x** By derogation from the provisions of 6.8.2.6 in relation to the application of 6.8.2.2.1 new tanks may, until 31 December 2011, be equipped with product discharge and air inlet valves as well as bottom valves which are not in accordance with the following standards:

- EN 14432:2006 Tanks for the transport of dangerous goods – Tank equipment for the transport of liquid chemicals – Product discharge and air inlet valves; and
- EN 14433:2006 Tanks for the transport of dangerous goods – Tank equipment for the transport of liquid chemicals – Foot valves,

but which are authorised in accordance with previous national regulations."

#### **Note by the Secretariat:**

The RID Committee of Experts can only discuss a transitional provision for tank-wagons in 1.6.3. Transitional provisions for tank-containers in 1.6.4 must be discussed by the RID/ADR/ADN Joint Meeting.

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