RID:  8th Session of the RID Committee of Experts’ standing working group  
(Utrecht, 20 to 24 November 2017)

Subject: Welding according to 6.8.2.1.23

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

1. At the Joint Meeting in March 2017, UIP proposed (informal document INF 6) amendments to 6.8.2.1.23 dealing with a harmonised approach regarding welding in relation to maintenance or repair.

2. Basically the UIP proposal was supported and finally led to a proposed text at the Joint Meeting in September 2017 and is now proposed for RID 2019 (see document OTIF/RID/CE/GTP/2017/15):

   "The ability of the manufacturer, or the maintenance or repair shop, to perform welding operations shall be verified and confirmed by either the competent authority or by the body designated by this authority. A weld quality assurance system shall be operated by the manufacturer or the maintenance or repair shop."

3. This proposal gives "the competent authority or the body designated by this authority" responsibility for verification and confirmation.

4. In the informal document referred to above, UIP suggested that in the case of repair and maintenance, the "inspection body recognized for the inspections according to 6.8.2.4" should be given this responsibility.

5. Rail tank-wagons are used and maintained in a European logistics market where inspection and repair are not usually linked to the country of type approval of such tanks. This special situation in the rail sector already means that RID 6.8.2.4.5 is used to support such maintenance processes outside of the country of approval. The proposed wording might be interpreted to mean that the authority issuing the type approval (or body designated by this authority) must authorise such welding procedures in repair and maintenance. This would be difficult or even impossible and contradicts the regulations and mu-
tual acceptance as defined in 6.8.2.4.5.

6. Furthermore, tanks approved under TPED for Class 2 are not linked to a specific national authority and such welding procedures are approved by such "Notified Bodies" under TPED regulations.

7. Therefore, UIP proposes to replace the first two sentences of 6.8.2.1.23 as follows:

"The ability of the manufacturer, or the maintenance or repair shop, to perform welding operations shall be verified and confirmed by either the competent authority, or by the body designated by this authority or, in case of welding during maintenance procedures, the relevant inspection body according to 6.8.2.4.5. A weld quality assurance system shall be operated by the manufacturer or the maintenance or repair shop."

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