



INF. 3

3 May 2022

(English only)

RID: 14th Session of the RID Committee of Experts' standing working group
(Berne/hybrid, 23 May 2022)

Subject: Comments on document ECE/TRANS/WP.15/AC.1/2021/34/Rev.1

Transmitted by UIP

1. In document ECE/TRANS/WP.15/AC.1/2021/34/Rev.1, Switzerland provided some guidance on interpreting the new requirements regarding approvals and inspections. The document was submitted to the RID/ADR/ADN Joint Meeting and it was agreed that the document would be published on the websites of UNECE and OTIF.
2. At the last Joint Meeting, UIP expressed some concerns regarding the document, as the guidance is not really based on the long experience there has been with RID with regard to the mutual recognition of inspections and the special situation regarding the "registration of wagons" within the territory of the EU in the light of the 4th Railway Package.
3. This means that, e.g.:
 - Due to the many years of experience in RID with regard to mutual recognition, inspectors currently listed on OTIF's website can continue their work for up to 10 years, even if they are approved on the basis of national requirements and are not accredited in accordance with EN 17020.
 - An initial inspection can always be performed either by inspection bodies of the registering country or by the body approved by the country of inspection and listed on OTIF's website. No further approval is needed in this case. In addition, for EU Member States, no further inspection will be required at all during the registration process once the 4th Railway Package has been implemented (see footnote 1 to 6.8.1.5.5) if the wagon has been authorised by ERA.

4. UIP contacted Switzerland after the Joint Meeting and it was suggested that UIP should draft an additional annex to the above-mentioned guidance to describe the particular situation in rail transport and that UIP should submit this draft annex to the next Joint Meeting in September 2022.
5. UIP wished to inform the standing working group of this situation and would like to ask the standing working group for its views and comments.
