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Geneva, 15-19 September 2008
Item 5 (a) of the provisional agenda

PROPOSALS FOR AMENDMENTS TO RID/ADR/ADN * **

Cylinders for breathing appliances

Transmitted by the Government of France

SUMMARY

Executive summary: This proposal is aimed at eliminating any ambiguity in the application of special provision 655, on cylinders for breathing appliances.

Action to be taken: Amend special provision 655 adopted for RID/ADR 2011.

Related documents: ECE/TRANS/WP.15/AC.1/2007/45 (Sweden)
INF.36 (Sweden) (March 2008)
ECE/TRANS/WP.15/AC.1/110, para. 49 and annex II.

* In accordance with the programme of work of the Inland Transport Committee for 2006-2010 (ECE/TRANS/166/Add.1, programme activity 02.7 (c)).

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Introduction

1. During the Joint Meeting held in March 2008, Sweden proposed an amendment relating to the carriage of cylinders for breathing appliances conforming with the requirements of the so-called PED directive (see ECE/TRANS/WP.15/AC.1/2007/45). It was decided to add the following new special provision 655:

“655 Cylinders and their closures designed, constructed and approved in accordance with Directive 97/23/EC of the European Parliament and of the Council of 29 May 1997 on the approximation of the laws of the Member States concerning pressure equipment (PED) and used for breathing apparatus may be carried without additional approval in accordance with Chapter 6.2, provided they are periodically inspected in accordance with the applicable requirements of packing instruction P200 in 4.1.4.1.

“All other applicable provisions of RID/ADR/ADN shall apply.”

2. The wording of the provision, adopted at the end of the session, raises some problems of interpretation. The approval requirements in Chapter 6.2 are not the only ones that do not take account of such cylinders: there are also the requirements relating to initial inspections and tests, and to marking. The provisions of Directive 97/23/EC are comparable and provide a satisfactory safety level.

3. Furthermore, the in-service inspection of pressurized equipment (including cylinders for breathing appliances) covered by Directive 97/23/EC is the responsibility of each country, i.e., is covered by national regulations. Some countries apply to breathing appliance cylinders inspection measures that differ from those used for the periodic inspection of portable cylinders containing air which are subject to RID/ADR. Such measures are often more restrictive, since:

- The breathing apparatus is “transported” on a human back, and this calls for extra caution; and
- The sorts of deterioration to which the equipment is subject to depend on the use to which it is put (the corrosive environment of diving, and thermal constraints during exposure to fire in firefighting operations ...).

4. Furthermore, the Joint Meeting omitted a number of points that cannot apply to breathing appliance cylinders that are in conformity with the above directive, such as the degree of filling defined in P200, and the marking stipulated by 5.2.1.6.

Proposal

5. To eliminate any ambiguity, we propose amending the text of provision 655 as follows (amendments in bold):

“655 Cylinders and their closures designed, constructed and approved in accordance with Directive 97/23/EC of the European Parliament and of the Council of 29 May 1997 on the approximation of the laws of the Member States concerning pressure equipment (PED) and used for breathing appliances may be carried without **conforming to** Chapter 6.2, provided **that at the very least they are subject to the inspections and tests set out in 6.2.1.6.1 in accordance with the periodicities defined in packing instruction P200 of 4.1.4.1.**

All other applicable provisions of RID/ADR/ADN shall apply, **with the exception of those of 1.8.7, of packing instruction P200 of 4.1.4.1, and of 5.2.1.6.”**

Justification

Safety: Improves safety.

Feasibility: No problem.

Enforcement: This amendment resolves problems with applicability.
