BUSINESS PLAN

CEN/TC 393
EQUIPMENT FOR STORAGE TANKS AND FOR SERVICE STATIONS

EXECUTIVE SUMMARY

Business Environment

- The storage of liquids is an important field in industry and household. The tank equipment industry is an important sector of these field for the safe storage of liquids (protection of people and environment);
- Tank equipments are (partly) covered by the Construction Product Regulation (CPR), (305/2011/EU), the Machinery Directive (2006/42/EC), the ATEX-Directive (2014/34/EU); the "Low voltage Directive" (2014/35/EU), the "Directive relating to electromagnetic compatibility" (2014/30/EU) and "Directive relating volatile organic compound (VOC) emissions resulting from the storage of petrol and its distribution from terminals to service stations" (stage I) 94/63/EC, Directive (Stage II) relating petrol vapour recovery during refuelling of motor vehicles at service stations 2009/126/EC
- Parties involved:
  - manufacturers and users of tanks,
  - manufacturers of tank equipments (e.g. overfill-prevention devices, leakage detection systems, nozzles etc.),
  - national legislative bodies,
  - testing and certification bodies,
  - fire risk regulators,
  - safety organizations,
  - petro-chemical industry,
  - public entities dealing with liquids storage,
  - distributors, installers and service providers,

  and indirectly interested parties such as heating industry.

Benefits

To define the necessary standards to provide consumers, distributors and manufacturers with a well-founded basis for questions of health, safety and environment, and to identify the essential different approaches to address fitness for purpose, where this is based on legislative requirement e.g. domestic heating fuel storage.

- Since 2015, 14 standards were adopted,
- Confidence of consumers in respect of safety and quality,
- The need of European governments to harmonize the technical requirements on the products
- to eliminate technical barriers to trade.

Priorities

To complete and revise European standards on the design and construction of equipment for storage tanks and for filling stations, especially to meet the requirements of the related European Directives.

1 BUSINESS ENVIRONMENT OF THE CEN/TC

1.1 Description of the Business Environment

The following political, economic, technical, regulatory, legal, societal and/or international dynamics describe the business environment of the industry sector, products, materials, disciplines or practices related to the scope of this CEN/TC, and they may significantly influence how the relevant standards development processes are conducted and the content of the resulting standards:

The tank equipment industry is an important sector for the safe storage and distribution of liquids. Markets tend to be nationally based on well established national laws (e.g. safety for environment, safety for explosion) and practices in each European country.

Interested parties in the standardization process for tank equipments are:

- manufacturers and users of tanks,
- manufacturers of tank equipments (e.g. overfill-prevention devices, leakage detection systems, nozzles etc.),
- national legislative bodies,
- testing and certification bodies,
- fire risk regulators,
- safety organizations,
- petro-chemical industry,
- public entities dealing with liquids storage,
- distributors, installers and service providers,
  and indirectly interested parties such as heating industry.

Tank equipment used for the storage of fuel intended for the supply of building heating/cooling systems and of water not intended for human consumption are covered by the Construction Product Regulation (CPR, 305/2011/EU) and have to fulfill the requirements given therein; CEN/TC 393 had received a corresponding mandat (M/131). 7 standards were prepared under this mandate.

CEN/TC 393 had received a corresponding mandat (M/456) under the Directive relating petrol vapour recovery during refuelling of motor vehicles at service stations (Stage II) 2009/126/EC.This mandate was accepted and 2 standards were prepared under this mandate.

1.2 Quantitative Indicators of the Business Environment

The following list of quantitative indicators describes the business environment in order to provide adequate information to support actions of the CEN /TC:

The production per annum has not yet been quantified. The industry is a mixture of small to medium sized companies. All over Europe there are only relatively few producers but the clients respectively users are of an uncountable number. Due to existing national regulations in the past it was nearly impossible to have trade with these tank equipments over the borders. But now with the upcoming standards more and more trade over borders can be recognized.

Besides general safety aspects for all standardization work for tank equipment the market needs in particular the standardization for instance for overfill-prevention-devices to enable unique delivery of petrol (mineral oil) for filling stations from tank vehicles.

2 BENEFITS EXPECTED FROM THE WORK OF THE CEN/TC

A high cost would be incurred by industry if specifiers were to insist on products of the highest safety classes when risk analysis demonstrates this is not justified.

Most applications for tanks involve storage of high-risk liquids. To avoid sub-standard production consistent technical specifications are of the utmost importance.

Authoritative European standards that demonstrate products are manufactured to consistent specifications where ‘safety in use’ is an imperative, will give consumers assurance and confidence in the industry which will in turn facilitate appropriate product choice.

The standards already and being drafted by CEN/TC 393 will provide the consumers, the distributors and the manufacturers with a well-founded basis for questions of health, safety and environment. They will identify the essential different approaches to address fitness for purpose, where this is based on legislative requirement e.g. domestic heating fuel storage.

European specifications for tanks could enable/assist the testing and approval of imports between EC member countries. However outside the scope of EC Mandate M/131, which covers only tanks and their related equipment to be used for the "storage of gas/fuel intended for the supply of building heating/cooling systems and of water not intended for human consumption", each country is justified in continuing to make their own requirements.

The situation is even more complicated as for "tank equipment" further European Directives (and Mandates) need to be considered, such as

- the ”Machinery Directive" (2006/42/EC);
- the “ATEX-Directive" (2014/34/EU);
- the "Low voltage Directive" (2014/35/EU);
- the "Directive relating to electromagnetic compatibility" (2014/30/EU);
- the "Directive relating volatile organic compound (VOC) emissions resulting from the storage of petrol and its distribution from terminals to service stations" (Stage I) (94/63/EC);
- the "Directive relating petrol vapour recovery during refuelling of motor vehicles at service stations" (Stage II) 2009/126/EC and
- the REGULATION (EU) No. 305/2011 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 9 March 2011 laying down harmonised conditions for the marketing of construction products

but existing national regulations in this field are estimated to be reduced adequately to the standards. The use of European Standards for this purpose could if implemented by mandate constitute an annual saving of millions of EUR even if installation and operational aspects may remain subject to national legislation in various member countries.

European trade without product standards would have serious consequences for product quality and potential health and safety and environmental risks. Strong commercial competition compels serious manufacturers to comply with recognized specifications to meet market needs.

3 PARTICIPATION IN THE CEN/TC

All the CEN national members are entitled to nominate delegates to CEN Technical Committees and experts to Working Groups, ensuring a balance of all interested parties. Participation as observers of recognized European or international organizations is also possible under certain conditions. To participate in the activities of this CEN/TC, please contact the national standards organization in your country.

4 OBJECTIVES OF THE CEN/TC AND STRATEGIES FOR THEIR ACHIEVEMENT

4.1 Defined objectives of the CEN/TC

The objectives of CEN/TC 393 are:

- To elaborate standards on requirements, testing and marking on tank equipments. These standards will cover domestic and industrial applications;
- To adjust the work programme to meet the market needs;
- To work in coordination with ISO when possible, and to align as closely as possible where technical differences are necessary.

The above objectives will:

- Assist free trade by harmonizing manufacturing, operation, testing, environmental and safety requirements;
- Provide a common set of European standards.

4.2 Identified strategies to achieve the CEN/TC.s defined objectives.

The actual work of altogether 5 work items and 1 preliminary work item are handled in 2 working groups of CEN/TC 393. This division allowed the different expertise to be concentrated appropriately.

The WGs resolve matters by a system of pre-arranged physical meetings, some drafting work by correspondence and increasing contact by e-mail, with the secretariat acting as a focal point. It is agreed to use English as the working language in the TC and in the WGs to minimize the need for interpretation/translation. The electronic document distribution system Livelink is used in the TC and in all WGs.

The work resulted in 24 published standards.

4.3 Environmental aspects

- The possibility of usage of riskless test liquids instead of fuels
- Consideration of environmental aspects by the selection of materials e.g. biodegradable leak detection liquids
- Recyclability of the products at the end of the life cycle

CEN/TC 393 agreed to consider environmental aspects during the preparation and revision of standards and recommended to include an environmental checklist as informative annex to the standards.

5 FACTORS AFFECTING COMPLETION AND IMPLEMENTATION OF THE CEN/TC WORK PROGRAMME

The following factors could negatively impact the completion and the revision of the CEN committee's standards:

- There are still legal/regulatory uncertainties regarding provisions and applicability of the EC Regulation 305/2011/EU (CPR) to tanks others than those covered by mandate M/131, such as tanks intended for service stations.
- According to the CEN-rules 5 countries must actively participate in the work. This rule cause problems if a published standard must be revised according to new safety laws and not sufficient participation by 5 countries exist.