Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Joint Meeting of the RID Committee of Experts and the Working Party on the Transport of Dangerous Goods

Geneva, 17-27 September 2013 Item 2 of the provisional agenda **Tanks**

Comments on ECE/TRANS/WP.15/AC.1/2013/48 - Harmonization of inspection and approval procedures for tanks for the carriage of substances of Class 2 and tanks for the carriage of substances of Classes 3 to 9

Submitted by the Government of Denmark

Introduction

Denmark supports in principle the proposal made by UIP, but in order to adapt existing approval procedures to the new system, a transitional period similar to 1.6.3.35 and 1.6.4.34 in ADR 2009 is necessary.

ADR 2009:

- 1.6.3.35 Contracting Parties need not apply the requirements of 1.8.6, 1.8.7 and 6.8.4 TA4 and TT9 before 1 July 2011.
- 1.6.4.34 Contracting Parties need not apply the requirements of 1.8.6, 1.8.7 and 6.8.4 TA4 and TT9 before 1 July 2011.

Proposal

Insert new transitional provisions in 1.6.3 and 1.6.4 applicable for tanks that are not subject to directive 2010/35/EU (TPED), for example:

- 1.6.3.XX For fixed tanks (tank-vehicles) and demountable tanks which are intended for the carriage of substances to which TA4 and TT9 of 6.8.4 as applicable up to 31 December 2014 are not assigned, Contracting Parties need not apply the requirements of 1.8.6 and 1.8.7 before 1 July 2017, but may instead apply the relevant requirements of 6.8.2 and 6.8.3 applicable up to 31 December 2014.
- 1.6.4.XX For tank containers and portable tanks which are intended for the carriage of substances to which TA4 and TT9 of 6.8.4 as applicable up to 31 December 2014 are not assigned, Contracting Parties need not apply the requirements of 1.8.6 and 1.8.7 before 1 July 2017, but may instead apply the relevant requirements of 6.8.2 and 6.8.3 applicable up to 31 December 2014.

It is entrusted to the tank working group to draft the most appropriate wording of the transitional provisions.

