

## Economic Commission for Europe

### Inland Transport Committee

#### Working Party on the Transport of Dangerous Goods

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

Bern, 17–21 March 2014

Item 2 of the provisional agenda

##### Tanks

04 March 2014

### Transitional measure for additive devices

#### Transmitted by Government of Belgium

#### Introduction

In the past biennia, additive devices for tanks were discussed in the Tanks Working Group, ultimately leading to a set of proposed provisions for the WP.15. These provisions were adopted for ADR in the form of SP 664 in the November 2013 session of the WP.15. Since then, Belgium has received comments on three particular items of the transitional measure accompanying the provisions for additive devices (ADR only).

1) Transitional measure 1.6.3.44 states that:

*“1.6.3.44 Fixed tanks (tank-vehicles) and demountable tanks intended for the carriage of UN Nos. 1202, 1203, 1223, 3475 and aviation fuel classified under UN Nos. 1268 or 1863, equipped with additive devices designed and constructed before 1 July 2015 in accordance with the provisions of national law, but which do not, however, conform to the construction and approval requirements of special provision 664 of Chapter 3.3 applicable as from 1 January 2015, may continue to be used with the approval of the competent authorities in the countries of use.”*

However, SP 664 b) states that:

(b) *Tank approval*

*For tanks equipped or intended to be equipped with additive devices, where the additive device is not included in the original type approval of the tank, the provisions of 6.8.2.3.4 shall apply.*

In that sense, the requirement for an approval from the countries of use seems difficult to implement in practice and the question is raised if this should not be the country of the type approval of the tank.

2) Secondly, 1.6.3.44 states that a competent authority approval may be given for existing systems not meeting the construction or approval requirements under SP 664. However, the possibility to deviate from testing requirements, in particular for the described case (a) (ii) of SP 664, are not included in this statement. This excludes the possibility of allowing for instance NDT test methods as alternatives.

Lastly, SP 664 states that:

(f) *Training of the vehicle crew*

*The additives carried do not require a separate specialisation training course of the vehicle crew in accordance with section 8.2.1.*

This was done to take account of the fact that specialised training for ADR drivers exists in different member states which does not cover the allowed additives under UN 1993 or UN 3082. However, no similar provisions were proposed for safety advisers with a certificate limited to “fuels” as stated under 1.8.3.13, last indent.

## **Proposal**

On the basis of a discussion in the Tanks Working Group, the Joint Meeting would be requested to formulate a recommendation for the next WP.15 meeting on:

- The necessity or opportunity to refer to the country where the tank type approval was issued in 1.6.3.44, instead of the country of use.
- The necessity of opportunity to include the testing requirements along with the construction and approval requirements in 1.6.3.44.
- The necessity or opportunity to add safety advisers to the exemption for training in SP 664.

Depending on the discussion, the Tanks Working Group may decide to formulate the textual amendments required to adequately reflect the outcome of the discussion as input for the next WP.15 meeting.

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