

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

**JOINT MEETING OF THE RID SAFETY COMMITTEE AND THE
WORKING PARTY ON THE TRANSPORT OF DANGEROUS GOODS**

(Geneva, 11-15 September 2006)

Comments on document TRANS/WP.15/AC.1/2006/22

(Tanks – transitional measures)

Transmitted by the Government of the United Kingdom

Introduction

1. In document 2006/22, the United Kingdom proposes transitional measures for manhole covers in relation to standard EN 13317.

The United Kingdom believes the text for these transitional measures should be made clearer to cover what was intended and to be consistent with similar transitional measures, e.g. 1.6.3.19, 1.6.3.20, 1.6.3.30 and 1.6.3.31.

The United Kingdom therefore proposes the following modified text from that shown in 2006/22.

Proposal

2. Add a new transitional measure in 1.6.3 of ADR as follows: -

“**1.6.3.X** Fixed tanks (tank vehicles) and demountable tanks constructed before 1 January 2007 in accordance with the requirements of 6.8.2.6 in relation to the properties of the material for manhole cover assemblies of EN 13317 in force up to 31 December 2006 but which do not, however, conform to these requirements of 6.8.2.6 applicable from 1 January 2007 may still be used.”

3. The United Kingdom would propose an ADR Multilateral Special Agreement (MSA) under 1.5.1 to cover the period 1 January 2007 to 31 December 2008.

Alternative approach

4. This transitional measure would cover the changes in relation to this particular standard. However in time new standards in relation to tanks will be developed and other existing standards updated or revised, e.g. EN 14025.

To also cater for these changes, the United Kingdom believes it would be preferable to adopt more general transitional measures as has been done for pressure receptacles in 1.6.2.5.

This has the additional advantage that transitional measures are not overlooked as occurred this time.

Alternative proposal

5. The United Kingdom proposes new general transitional measures in 1.6.3 and 1.6.4 in both RID and ADR as follows: -

“**1.6.3.X** Tank wagons/Fixed tanks (tank vehicles), wagons with demountable tanks/demountable tanks and battery wagons/battery vehicles designed and constructed in accordance with referenced standards applicable at the time of their construction and which are modified, revised or no longer listed in 6.8.2.6 may still be used.”

“**1.6.4.Y** Tank-containers and MEGCs designed and constructed in accordance with referenced standards applicable at the time of their construction and which are modified, revised or no longer listed in 6.8.2.6 may still be used.”

6. Currently only 1.6.3.X in ADR is required, but the United Kingdom would like to establish the principle to add the others in RID and ADR when applicable.
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