

## 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

7 August 2020

Bern, 10-11 September and Geneva, 14-18 September 2020

Item 5 (b) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:  
new proposals**

### **Comment on document ECE/TRANS/WP.15/AC.1/2020/20: Supplementary information from the informal working group on the inspection and certification of tanks: Proposed amendments to Chapter 6.8 and to Sections 1.8.7 and 1.8.6**

**Transmitted by the Government of Belgium**

#### *Summary*

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| <b>Executive summary:</b>  | The proposed texts concerning the choice of the inspection bodies can cause serious problems for the functioning of the current market organization of tank-containers.  |
| <b>Action to be taken:</b> | Amend the meaning of the term “country of registration” in the right hand column of paragraph 6.8.1.5  |
| <b>Related documents:</b>  | ECE/TRANS/WP.15/AC.1/2020/20: Supplementary information from the informal working group on the inspection and certification of tanks: Proposed amendments to Chapter 6.8 and to Sections 1.8.7 and 1.8.6, informal documents INF.6/Rev.1 (see point 3) and INF.23. |

## **Introduction**

1. Belgium introduced the document INF.23 originally for the joint meeting scheduled in March 2020, which was cancelled. This document was however discussed during the informal working group on the inspection and certification of tanks on the 10<sup>th</sup> and 11<sup>th</sup> June (MS Teams meeting).
2. In informal document INF.23, Belgium noted that the proposed text in 6.8.1.5.1, 6.8.1.5.3 and 6.8.1.5.4 of the document ECE/TRANS/WP.15/AC.1/2020/20 could create problems if the owner and/or the operator are not known.
3. ITCO confirmed that tank containers might be manufactured for owners that operate the tank but often the owner is a financial lease company that does not operate the tank and may not be registered in a contracting state. The eventual operator(s) of the tank container is often not known at the time of manufacture. As a result, it is impractical to determine a single inspection company recognized by the Contracting State/a Contracting Party where the operator is registered.
4. The group understood the problem raised by Belgium but instead of the solution proposed in INF.23, the group proposed to amend, for tank-containers, the meaning of the term “country of registration” in 6.8.1.5 such that the country of registration could be the

country of the competent authority that approved the inspection body for the initial inspection.

## Proposals

5. In 6.8.1.5, modify (new text in bold) in the right-hand column as follows:

6.8.1.5 *Conformity assessment, type approval and inspections procedures*

The following provisions describe how to apply the procedures in 1.8.7.

For the purpose of this sub-section the term “country of registration” means:

- the RID Contracting State/Contracting Party to ADR of registration of the wagon/vehicle on which the tank is mounted;

- for demountable tanks, the RID Contracting State/Contracting Party to ADR where the owner's or operator's company is registered.

- the RID Contracting State /Contracting Party to ADR where the owner's or operator's company is registered;

**- if the owner’s or operator’s company is not known, the RID Contracting State/Contracting Party to ADR of the competent authority that approved the inspection body which performed the initial inspection.**

The inspection body responsible for assessing the conformity of the complete tank shall verify, to the extent necessary, that all of its components conform to the requirements of RID/ADR, irrespective of where they have been manufactured.

## Justification

- the tank-container market and use differ from tank-vehicles and tank-wagons;
  - tank-containers are by definition multimodal and travel on long distances;
  - tank-containers are used within RID/ADR and are not based in any one country;
  - the country of manufacture is not always in the RID/ADR area;
  - the country of registration of the operator is not always known at the time of inspection.
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