

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
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Tanks

UIC's comments on documents 2021/3, 2021/10, 2021/19, INF.16 and INF 31

With this document, UIC wishes to highlight a number of points that should be taken into account when making amendments to provisions for the continued use of tank-wagons, demountable tanks, battery-wagons (RID)/fixed tanks (tank-vehicles), battery-vehicles (ADR), tank-containers, tank swap bodies and MEGCs after the date/deadline for the intermediate inspection in order to ensure greater clarity in future for all parties concerned:

1. There is no common understanding and no definition of the terms “Date of the next inspection” and “Deadline for the next inspection” in 1.4.2.2.1 d) and in subsection 1.4.3.3 b).

The term “Deadline for the next inspection” in 1.4.2.2.1 d) was introduced following the introduction of the provisions in 6.8.2.4.3 and 6.8.2.5.2 regarding the three-month grace period for performance of the intermediate inspection.

This was done to allow for the fact that tanks handed over for carriage after the date (month/year) of the intermediate inspection indicated with “L” (see RID 6.8.2.5.2, last bullet point) may still be accepted by the carrier. It also made allowance for the fact that a tank filled shortly before expiry of the date/deadline for the next inspection (e.g. tank-wagon, tank-container) may be accepted by the carrier following expiry of this date/deadline (particularly in railway transport with initial carriage by road).

However, this amendment was not implemented in respect of the filler’s obligations in 1.4.3.3 b). It could thus be considered that a filler may only fill a tank until the stipulated date (month/year) of the intermediate inspection, even if this date has an “L” and thus in fact represents a “deadline for the next inspection”.

2. UIC is therefore of the view that the following clarification should be added.

Date of next inspection:

For tank wagons: The date of the next periodic inspection indicated on both sides of the tank wagon (month/year), e.g. **09/21** (i.e. **30/09/2021**).

For demountable tanks, battery-wagons (RID)/fixed tanks (tank-vehicles), battery-vehicles (ADR), tank-containers, tank swap bodies and MEGCs: the date of the next periodic inspection calculated on the basis of the last periodic inspection performed.

Deadline for next inspection:

For tank wagons: The period in which the next intermediate inspection is to be performed. This is obtained from the date indicated on both sides of the tank-wagon with the month/year with the addition of the letter “L”, e.g. **09/21 L +/- 3 months** (i.e. **01/07/2021 - 31/12/2021**)

For demountable tanks, battery-wagons (RID)/fixed tanks (tank-vehicles), battery-vehicles (ADR), tank-containers, tank swap bodies and MEGCs: the deadline for the next intermediate inspection calculated on the basis of the last periodic inspection performed.

3. If there is a wish to extend the provisions for use of tanks/tank-wagons in 4.3.2.3.7 to the intermediate inspection, this would be possible by making the following amendments:

- a) In 4.3.2.3.7, replace all occurrences of the term “deadline” with “date”.

Insert a new section 4.3.2.3.8:

Following **expiry of the deadline for the inspection prescribed in 6.8.2.4.3**, tank-wagons, demountable tanks, battery-wagons (RID)/fixed tanks (tank-vehicles), battery-vehicles (ADR), tank-containers, tank swap bodies and MEGCs may neither be filled nor consigned for transport.

However, tank-wagons, demountable tanks, battery-wagons (RID)/fixed tanks (tank-vehicles), battery-vehicles (ADR), tank containers, tank swap bodies and MEGCs filled before expiry of this **deadline** may be consigned in the following cases:

a) within a period not to exceed one month beyond the date of expiry of this deadline, and

b) within a period not to exceed three months beyond the date of expiry in order to allow the return of dangerous goods for proper disposal or recycling, unless stipulated otherwise by the competent authority. Reference to this exemption shall be mentioned in the transport document.

The filler’s obligations outlined in 1.4.3.3 b) would also have to be amended as follows as a consequence:

“...the filler has the following obligations in particular: ... **neither the date of the next periodic inspection nor** the deadline for the next **intermediate** inspection has ~~not~~ expired.”

Further editorial amendments as a consequence, e.g. in 5.4.1.1.11.
