

## **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**

**9 August 2021**

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Item 2 of the provisional agenda

**Tanks**

### **Comment on document ECE/TRANS/WP.15/AC.1/2021/27 - Clarification on using tanks after the deadline specified for the next test or inspection**

**Transmitted by the Government of Poland**

#### **Introduction**

1. In relation to document ECE/TRANS/WP.15/AC.1/2021/27 presented by the International Union of Wagon Keepers (UIP) on the use of tanks after the date specified for the next test or inspection, Poland presents a position on this matter.

2. Out of two proposals presented in the document, Poland strongly supports the alternative proposal.

The advantages of this proposal are:

- a) an unambiguous indication of the date by which the tank can be filled and placed for carriage;
- b) an explicit specification of the period, immediately after a specific filling date, that a filled tank may be carried;
- c) the proposed time periods allowing the carriage of dangerous goods after the date specified for the periodic inspection (1 month) and the date specified for the intermediate inspection (3 months) seem reasonable for the inland transport of dangerous goods;
- d) the proposed time periods allowing the carriage of dangerous goods after the date specified for the periodic and intermediate inspection create comfortable conditions for the carrier who is able to deliver the goods to the consignee without undue stress, even in the event of unforeseen stoppages during transport;
- e) the filled tank can be offered for carriage even on the last day before the specified date for filling, because it will be allowed to be transported within the prescribed period (1 or 3 months, in special cases 6 months);
- f) for railway tanks, the specified dates for the next periodic and intermediate inspection, which are also specified dates for filling and offering for carriage after filling, are clearly specified and included in the certificate of inspection of tank (initial, periodic, intermediate and extraordinary) and on both sides of the tank-wagon (see 6.8.2.5.2 RID), which facilitates the work of the filler (1.4.3.3 (b) RID/ADR) and the carrier (1.4.2.2.1 (d) RID/ADR);
- g) for other tanks (demountable tanks, battery-vehicles (RID) / fixed tanks (tank-vehicles), demountable tanks, battery-vehicles (ADR), tank-containers, tank swap bodies and MEGCs) the dates of the next periodic and intermediate inspection, which are both specified dates for filling and offering for carriage

after filling, are clearly specified and recorded in the inspection reports (initial, periodic, intermediate and extraordinary) of tanks;

- h) it should be noted that the date and type of the last initial inspection periodic inspection or intermediate inspection for tanks carried out should be indicated on the tank plate. From these dates, the participant in the carriage of dangerous goods in tanks, in particular the filler and the carrier, can calculate a specific date for the next test. If in doubt, they can ask the safety advisers for the carriage of dangerous goods.

3. The main disadvantage of the first proposal in points 8 to 11 of the UIP document ECE/TRANS/WP.15/AC.1/2021/27 is the authorization to operate the tanks after the date specified for the next intermediate inspection required in 6.8.2.4.3 as indicated in proposed regulations 4.3.2.3.8 (see clause 9 of the UIP document).

4. In practice, this provision may often lead to a tank being refilled on the last day of the three-month period after the date specified for the next intermediate inspection and offered for carriage on that day. If the carriage in this tank is not completed on the day of shipment of the tank for transport for any reason, then a problem arises.

5. The tank can also be offered for carriage a few days before the expiry of 3 months after the date specified for the next intermediate inspection, and for various reasons it will not be delivered to its destination before that date, creating a problem.

6. Therefore, Poland believes that the alternative proposal is definitely a better solution than the first one.

7. At the same time, Poland proposes to correct the proposed provision in point 14 (UIP document). We believe that there is no need to add in 1.4.2.2.1 (d) the text "taking into account the provisions of 4.3.2.3.7". Provision of 4.3.2.3.7 is already mentioned in the note, which remains unchanged.

8. Poland supports the modification of 6.8.2.4.2 proposed in point 17 by adding the following text after the first paragraph:

« If, for any reason, a periodic inspection is performed before the date specified for this inspection, the dates for the next inspections shall be specified on the basis of this date. »

At the same time, we suggest that this provision should take into account the situation where the periodic inspection is performed for any reason after the date specified for this inspection.

9. We propose an amendment to the provision in point 14 referring to the provision in 6.8.2.4.2 as follows:

In 6.8.2.4.2, after the first paragraph, add the following text (proposed amendment **in bold text**):

« If, for any reason, a periodic inspection is performed before **or after** the date specified for that inspection, the dates for the next inspections shall be specified on the basis of this date. »

## Proposals

10. Poland proposes to accept the alternative proposal presented in document ECE/TRANS/WP.15/AC.1/2021/27 (UIP).

11. We propose to correct the entry in point 14 of the document ECE/TRANS/WP.15/AC.1/2021/27 (UIP) by deleting the text in 1.4.2.2.1 (d) "taking into account the provisions of 4.3.2.3.7". The provisions of 4.3.2.3.7 are already listed in the Note in 1.4.2.2.1 (d), which remains unchanged.

12. We propose an amendment to the entry in point 17 in the document ECE/TRANS/WP.15/AC.1/2021/27 (UIP) referring to the provision in 6.8.2.4.2.

In 6.8.2.4.2, after the first paragraph, add the following text (proposed modification in bold):

« If, for any reason, a periodic inspection is performed before **or after** the date specified for this inspection, the dates for the next inspections shall be specified on the basis on this date. »

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