



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, 14 March – 18 March 2022

Item 2 of the provisional agenda

Tanks**Comments 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 the United Kingdom* ** *****

1. Due to time constraints during the September 2021 session, the Joint Meeting and the Working Group on Tanks were not able to consider the issue of early or late inspections addressed in paragraph 17 of working document ECE/TRANS/WP.15/AC.1/2021/27 from the International Union of Wagon Keepers (UIP), in paragraph 12 of informal document INF.10 from Poland, and in paragraphs 3 to 7 in informal document INF.41 from the United Kingdom.
2. The document from the United Kingdom sought to clarify the inspections to be performed before a tank can be accepted back into service after having missed the timeframe for their scheduled inspections, including for tanks that have missed two or more periodic inspections. This scenario was considered in informal document INF.31 of the spring 2021 session of the Joint Meeting and was based on national guidance issued to inspection bodies by the United Kingdom competent authority.
3. In light of the discussions during the spring 2021 session, the national guidance has been under review, and based on all the discussions that have taken place to date, the United Kingdom would consider an inspection performed after the timeframe for a scheduled inspection to be an exceptional inspection, which would need to fulfil the requirements of:
 - (i) the overdue inspection, if only one inspection had been missed, or
 - (ii) a periodic inspection, plus an examination of the relevant parts of the technical documentation or a check of the design characteristics, capacities and marking of the tank plate, if two or more periodic inspections have been missed.

* A/76/6 (Sect.20), para. 20.76.

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*** This document was scheduled for publication after the standard publication date owing to circumstances beyond the submitter's control.

In such cases the date for the next inspection would be taken from the date of the exceptional inspection.

4. The United Kingdom is also of the view that a periodic inspection should be allowed to be performed one month before the specified date without affecting the timeframe for the scheduled inspections. Accordingly, the United Kingdom would welcome an exchange of views to clarify the requirements for tanks that have missed two or more periodic inspections or have a periodic inspection up to one month early.

5. In addition, the United Kingdom believes the opportunity should also be taken to clarify the specified date for the first periodic inspection and the first intermediate inspection. The United Kingdom is of the opinion that these dates should be six | five years after the date of the initial hydraulic pressure test and three | two and a half years after the date of the initial leakproofness test.

6. In the opinion of the United Kingdom, a clear and common approach to all the above inspections should be established to achieve consistency across the contracting countries/parties. If it is agreed that such clarification would be helpful, the United Kingdom is willing to prepare draft proposals for the Joint Meeting.
