Dual approval of tank-containers

Transmitted by the Government of France

Introduction

1. When RID/ADR was restructured, Chapter 6.7 was introduced to include the UN portable tanks. Portable tanks are in practice the tank-containers used for maritime transport which can also be used for land transport. At the same time, it was decided to keep the RID/ADR requirements of Chapter 6.8 to deal with land tank-containers.

2. The current practice is that portable tanks of Chapter 6.7 are often also approved as tank-containers of Chapter 6.8. There are different reasons for this. For example, some industries only accept to fill tanks with a tank code in accordance with Chapter 6.8 even if the tanks are approved in accordance with Chapter 6.7.

3. In practice this dual approval leads to various problems. Some of them were presented during meetings of the Working Group on the inspection and certification of tanks but could not be fully discussed. However, it can be noted that several countries shared their views on this situation as a problem.

4. To clarify the situation, we believe that portable tanks used worldwide for multimodal transport should only be approved in accordance with Chapter 6.7 and that dual approval should no longer be possible.

Proposal

5. This question could be considered by the Working Group on Tanks. Based on the discussion an official document will be presented to the next session of the Joint Meeting.