

## Economic Commission for Europe

### Inland Transport Committee

Working Party on the Transport of Dangerous Goods

6 September 2023

Joint Meeting of the RID Committee of Experts and the  
Working Party on the Transport of Dangerous Goods

Geneva, 19–27 September 2023

Item 2 of the provisional agenda:

**Tanks**

## Dual approval of tanks under Chapters 6.7 and 6.8 of RID/ADR

**Transmitted by the European Industrial Gases Association (EIGA)**

### Introduction

1. EIGA would like to thank the French delegation for their approach on the matter of “dual approval” of tanks under Chapters 6.7 and 6.8 of RID/ADR, described in ECE/TRANS/WP.15/AC.1/2023/46.
2. In principle, EIGA agrees with the French approach to discontinue allowing dual approval as currently practiced. The regulations are clear in that tanks approved either under 6.7 or 6.8 may both be used for national and international carriage within states party to RID/ADR.
3. However, there are states party to RID/ADR that do not allow free movement of portable tanks approved under RID/ADR 6.7. If multimodal tanks (specifically in compliance with IMDG-code) are used in these countries, currently a double-approval is required.
4. As mentioned by France in informal document INF.33 of the March 2023 Joint Meeting, in some states party to RID/ADR filling of tanks without a Chapter 6.8 approval is prohibited.
5. EIGA is concerned that the countries that do not allow free movement or filling of tanks approved according to RID/ADR 6.7 will not change their position, even if dual approval becomes prohibited. This would prohibit free movement and filling of tanks approved according to RID/ADR 6.7 in some countries.
6. Unless free movement and filling of tanks with an approval according to RID/ADR 6.7 does not become explicitly allowed in all states party to RID/ADR, EIGA is not in favour of removal of dual approvals.
7. EIGA’s concern with Proposal 1 is that tanks will continue to be designed such that they could comply with both 6.7 and 6.8. This would imply that tanks conform with both chapters would not be allowed to have either approval.
8. It may be better to write at the end of the NOTE 1 under the titles of Chapter 6.7 and of Chapter 6.8:  

“A tank complying with Chapters 6.7 and 6.8 can only be approved according to either Chapter 6.7 or Chapter 6.8, but not both.”
9. EIGA does not understand which informal document by France is referenced in Proposal 2 and hence does not understand the intention of that proposal.
10. Concerning Proposal 3 of document ECE/TRANS/WP.15/AC.1/2023/46, EIGA is unsure who would be allowed to make the decision on which approval would be kept and which would be waived. Would the owner have to choose one for the next periodic or intermediate inspection?

11. Also concerning Proposal 3, what would happen if the next periodic or intermediate inspection of the tank were to be after 1 July 2027, considering that the time period until the next inspection of tank containers in accordance with RID/ADR 6.8 can be 6 or 8 years? It would be better to allow use according to current regulations until the next intermediate or periodic inspection to avoid this gap.

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