

**Committee of Experts on the Transport of Dangerous Goods  
and on the Globally Harmonized System of Classification  
and Labelling of Chemicals**

Sub-Committee of Experts on the Transport of Dangerous Goods

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Item 6 (c) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations  
on the Transport of Dangerous Goods:**

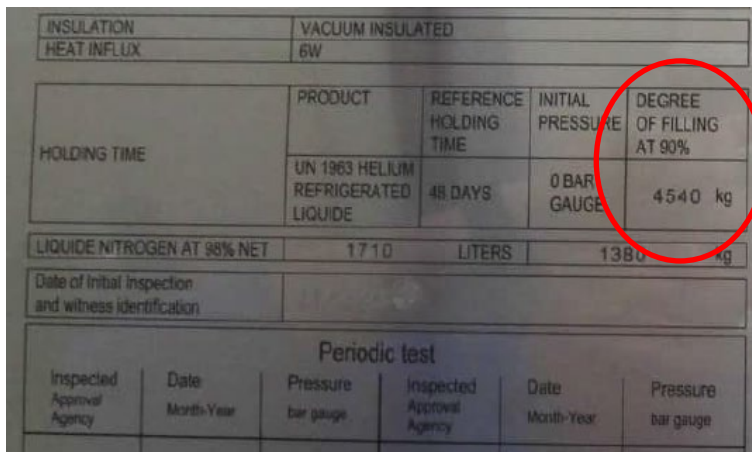
**Portable tanks:**

**New transitional measures for portable tanks 6.7**

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

**I. Introduction**

1. In document ST/SG/AC.10/C.3/2022/23 and informal document INF.18 TDG, submitted to the sixty session of the ECOSOC Sub-Committee of Experts on the Transport of Dangerous Goods, Spain proposed changes concerning the use of the terms “degree of filling” and “filling ratio”.
2. While EIGA agreed to the proposed changes, there was an oversight of required transitional measures for the adopted text.
3. The changes to 6.7.4.15.1 (i)(iv) require changes to the tank plates of existing portable tanks, specifically changing “Degree of filling” to “Maximum allowable mass of gas filled”, see photo below.



4. In most cases, the space on the current tank plates is limited and a completely new tank plate has to be applied in cooperation with a notified body.
5. For some portable tanks already in use, the manufacturer of the unit no longer exists, making the creation of new tanks plate problematic.
6. Even if there is enough space on the existing tank plates, it is not feasible to have these changes done on all portable tanks in use with coming into force of the new regulations. Portable tanks are used worldwide and may only visit a site capable of changing the tank plates at the next periodic or intermediate inspection of the unit.

## II. Proposal

7. In 6.7.4.15.1, insert the following note at the end:

NOTE: Portable tanks manufactured prior to 1 January 2025 which were marked in accordance with the requirements of 6.7.4.15.1 (i)(iv) applicable in the twenty second revised edition of the Model Regulations may continue to be used.

## III. Justification

8. The adopted changes concerning “degree of filling” have no safety implications.
9. Having to perform changes on or replacing existing tank plates puts an unjustified burden on the operators of such units.
10. If the manufacturer of portable tanks in use no longer exists, this makes the required changes even more problematic.
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