

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

22 August 2024

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

Geneva, 10–13 September 2024

Item 2 of the provisional agenda

Tanks

Enforcement of RID, ADR and ADN with respect to tanks dual approved as both UN portable tanks and RID/ADR tank-containers

Transmitted by the International Tank Container Organisation (ITCO)

Executive summary

Competent authorities have informed the Working Group on Tanks during the intersessional meetings on matters concerning dual approved intermodal tanks. These tanks are approved as both UN portable tanks subject to the provisions of Chapters 4.2 and 6.7, and also the provisions of Chapters 4.3 and 6.8 for RID/ADR tank-containers. This document is a response to statements that dual approved tanks can present an enforcement problem. The following proposals are aimed to assist enforcers where they encounter dual approved tanks.

Proposal with respect to enforcement of RID and ADR dual approved intermodal tanks with approvals as both UN portable tanks and RID/ADR tank-containers

1. **Add new paragraph in 5.4.1.1.25 to Chapter 5.4 of ADR:**

“Special provision for tanks approved as both UN portable tanks and RID/ADR tank-containers

When a tank being used for the carriage of dangerous goods is dual approved as both a UN portable tank and an ADR tank-container, the following statement shall be included in the transport document:

“Carriage in accordance with the provisions for ADR tank-containers”

or

“Carriage in accordance with the provisions for portable tanks”

as appropriate.”

2. **Add new paragraph in 5.4.1.1.25 to Chapter 5.4 of RID:**

“Special provision for tanks approved as both UN portable tanks and RID/ADR tank-containers

When a tank being used for the carriage of dangerous goods is dual approved as both a UN portable tank and an RID tank-container, the following statement shall be included in the transport document.

“Carriage in accordance with the provisions for RID tank-containers”

or

“Carriage in accordance with the provisions for portable tanks”

as appropriate.”

3. **Add a new Note under 1.1.4.2.3:**

“For the carriage of dangerous goods in dual approved tanks as both UN portable tanks and RID/ADR tank-containers see 5.4.1.1.25.”
