

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

Multimodal transport of portable tanks and MEGCs

Transmitted by the expert from the United Kingdom of Great Britain
and Northern Ireland

I. Introduction

1. The expert from the United Kingdom would like to bring attention to the requirements for multimodal transport of portable tanks and MEGCs to seek clarifications, specifically in relation to paragraph 6.7.1.1 of the *Model Regulations*. The Sub-Committee is asked to help answer the questions set out within this document.

II. Discussion

2. Paragraph 6.7.1.1 of the *Model Regulations* currently reads:

“The requirements of this chapter apply to portable tanks intended for the transport of dangerous goods, and to MEGCs intended for the transport of non-refrigerated gases of Class 2, by all modes of transport. In addition to the requirements of this chapter, unless otherwise specified, the applicable requirements of the International Convention for Safe Containers (CSC) 1972, as amended, shall be fulfilled by any multimodal portable tank or MEGC which meets the definition of a “container” within the terms of that Convention. Additional requirements may apply to offshore portable tanks or MEGCs that are handled in open seas”.

3. In summary, portable tanks and MEGCs, intended for the transport of non-refrigerated gases of Class 2, may be used to multimodally transport dangerous goods if they meet the requirements of Chapter 6.7 and CSC 1972, provided, in the case of the latter, the definition of a “container” within CSC is met. Furthermore, the last sentence of 6.7.1.1 gives scope for additional requirements to apply for offshore portable tanks or MEGCs handled in open seas.

4. Standard ISO 10855-1:2018 deals with offshore containers and associated lifting sets. Offshore containers are characterised by a highly specified structural frame and offshore top lifting lugs in each top corner which facilitate lifting with a sling, using a central lifting point. Standard ISO 10855-1:2018 meets the requirements of IMO MSC/Circ.860 (1998) (referenced in *IMDG Code*, at 6.7.1.1.1) for the design, construction, inspection, testing and in-service examination of offshore containers and associated lifting sets which are handled in open seas.

5. Such offshore containers can have differences to standard shipping or tank type containers but may, in some cases we understand, be dual certified to both CSC 1972 (CSC plated) and standard ISO 10855-1.

6. Whilst section 3.2, CSC 1972 directs that CSC does not necessarily apply to offshore containers handled in open seas, it goes on to state: '*offshore containers may be approved under the provisions of the CSC provided the containers meet all applicable provisions and requirements of the Convention*'.

III. Questions

7. In discussions on this issue nationally two questions have arisen:

(a) Our opinion is that 6.7.1.1 reads that should a portable tank or MEGC be certified to CSC 1972 it may be used for multi-modal transport irrespective of whether it is also certified to standard ISO 10855-1, provided that when the portable tank or MEGC is used for multi-modal transport it is in full conformity with the provisions of CSC 1972 / its CSC approval and the relevant requirements of Chapter 6.7 of the *Model Regulations*. Is this also the interpretation of the Sub-Committee?

(b) Given ISO 10855-1 is a relatively new standard, would it be a useful clarification to include within the last sentence of 6.7.1.1 that such 'additional requirements' may include, but is not limited to ISO 10855-1:2018?

8. The expert from the United Kingdom would be willing to submit proposals to amend the *Model Regulations*' text at future sessions if the Sub-Committee felt it necessary.
