

## **Economic Commission for Europe**

### **Inland Transport Committee**

#### **Working Party on the Transport of Dangerous Goods**

**9 September 2016**

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

Geneva, 19–23 September 2016

Item 2 of the provisional agenda

#### **Tanks**

### **Comment on ECE/TRANS/WP.15/AC.1/2016/37: Carriage of tanks for bromine after the expiry date of the annual test of the lining**

#### **Transmitted by the Government of the United Kingdom**

1. As noted by the experts of France, tanks that are used for the carriage of bromine (UN 1744) have additional special provisions which set out the lining requirements and the need for the lining to be subjected to annual inspections. This is in addition to the intermediate and periodic inspections that are required for all tanks. We are concerned that it seems the bromine industry has always thought that the provisions of 6.7.2.19.6 apply to this annual test required by special provision TP10, offering extensions to carriage beyond the expiration of this test deadline for portable tanks.

2. In our view, as the text is currently drafted in TP10, the requirement to have an annual test on the lining of the tank is absolute. Therefore, the provisions of 6.7.2.19.6 do not apply. Likewise, it is our view that the provisions contained within 4.3.2.4.4 and the newly introduced 4.3.2.3.7 do not apply to the annual inspection required by TT2 for RID/ADR tanks. The use and assignment of these special provisions is to treat bromine differently to other substances that are carried in tanks and subject to the standard tank provisions.

3. We are concerned that an interpretation otherwise given in this forum would not be sensible. Any decision to allow any of the relief offered by 6.7.2.19.6 or by an amendment to TP10 should of course be discussed by the UN Sub-Committee where these provisions originate.

4. It should be noted that the United States of America has noted that in their view there is no relief offered from the requirements of TP10, and to amend this situation they have submitted a paper (ST/SG/AC.10/C.3/2016/79) to the UN Sub-Committee to propose an amendment to this special provision.

5. We believe that any consideration of the parallel provisions for RID/ADR tanks for bromine should await the outcome of discussions on portable tanks at UN level.

---