

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

8 June 2011

Thirty-ninth session

Geneva, 20–24 June 2011

Item 5 (b) of the provisional agenda

Miscellaneous proposals of amendments to the

Model Regulations on the Transport of Dangerous goods: portable tanks

Transitional arrangements for portable tanks intended for the transport of liquids

Transmitted by the expert from the United Kingdom

1. The Sub-Committee will recall that at the December 2010 session the expert from the United Kingdom presented INF 28 which highlighted the problems encountered by the users of portable tanks. Continuous changes to the T codes for various substances meant that existing portable tanks that still had years of service and had not had any safety problems had to be scrapped.
 2. This led to owners of portable tank fleets incurring a severe financial burden when changing to a different type of tank particularly as the transitional periods were too short to allow the costs of any change to be easily absorbed. The expert of the United Kingdom provided details of the costs incurred as well as various case studies and he put forward a number of suggestions for lengthening the transitional periods.
 3. The expert from the United Kingdom realised that at the final meeting of a biennium it would not be possible to have a full debate or come to a decision on what is a complicated subject. The Sub-Committee agreed to the United Kingdom's proposal to have this topic added to the work programme over the coming biennium.
 4. The expert from the United Kingdom fully intends to pursue this issue over the coming biennium but is not in a position to put forward a working paper for the June 2011 session. Instead she will present one for the December session which will put forward arguments for lengthening the transitional periods on both cost and safety grounds. In the meantime he would welcome further written comments and contributions from other Sub-Committee experts.
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