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**COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS**

**Sub-Committee of Experts on the
Transport of Dangerous Goods**
(Fifteenth session,
Geneva, 29 June-10 July 1998,
agenda item 2 (b))

TANKS
Other tank matters

Tank Coding and Implementing the Rationalized Approach

Transmitted by the Expert from Belgium

BACKGROUND

1. During its fourteenth session, the Sub-Committee adopted in principle the proposal by the Expert of the United States of America (document ST/SG/AC.10/C.3/1997/88 and -/88/Add.1) to revise the coding system for multimodal tanks by implementing the rationalized approach.
2. The vast majority of substances are already in line with this new rationalized approach. For the others there are two possibilities:
 - the tank provisions become more severe
 - the tank provisions become less severe(Sometimes their tank provisions no longer exist in the rationalized T-codes).
3. Multimodal tanks are already being used (namely the IMO portable tank types) and therefore the introduction of the rationalized approach for the T-codes creates problems for the portable tanks transporting substances for which tank provisions are going to change.

- It is obvious that when the tank provisions become more severe, industry can no longer use the portable tank they have been using for many years. If this is a dedicated tank, it will become useless. For the others, the range of products which can be transported decreases.
- Even when the tank provisions become less severe, the tankowner has a problem: industry will no longer want his tank for that product because of the higher costs involved (e.g. higher wall thickness includes a heavier tank and a lower nett mass, ...).

It must still be possible to use the IMO portable tanks for many years (the normal lifetime of a tank is estimated to be at least 20 years).

4. For the foregoing reasons, the Expert from Belgium is of the opinion that it is unfeasible to implement the rationalized approach in one go and for all substances, without having studied in detail the economical and practical implications in relation to the increase in safety. If the rationalized approach is used for all substances in one go, it is to be feared that a lot of tank owners and tank users will ask for deviations, competent authority approvals, etc. at the time of implementation because only then they will see for the first time the consequences of the new rules. Daily work in the office indicates that the majority of the industry is not aware of these.

PROPOSAL

The Expert from Belgium proposes that the economical and practical implications of the introduction of the rationalized approach for assigning T-codes are to be taken care of for the existing portable tanks before this principle is put into practice.
