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Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Dangerous Goods****Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods**

Bern, 25-28 March 2024

Item 2 of the provisional agenda

Tanks**Exemption for calculating of actual holding time for tank-
containers and portable tanks for road journey only****Transmitted by the Government of the Netherlands*,*****Summary*

- Executive summary:** Calculation actual holding time is difficult to perform and has limited additional value if tank-containers and portable tanks are used on road journeys only. It is proposed to exempt this as it is done for (road) tank-vehicles.
- Action to be taken:** Exempt the calculation of actual holding time for carriage in tank-containers and portable tanks for road journeys only.
- Related documents:** Informal documents INF.10 and INF.11 of the Autumn 2023 session of the Joint Meeting, ECE/TRANS/WP.15/AC.1/170/Add.1 in paragraphs 32 and 33 (informal document INF.46), informal document INF.16 of the 114th session of the Working Party on the Transport of dangerous Goods (WP.15) and ECE/TRANS/WP.15/264 paragraphs 56-57.

Introduction

1. Tank-vehicles are exempted from the calculation of actual holding time. Not only the duration of the journeys is relatively short, but also the presence of the driver to influence the conditions in the tank, if necessary, makes the premature activation of the pressure relief device a rare occasion.

* A/78/6 (Sect.20), table 20.5.

** Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2024/18.



2. When tank-containers or portable tanks are used for road journeys only, that means without transloading onto another, or from another transport mode, the same conditions apply as for tank-vehicles. It is proposed to exempt these transport operations from the calculation of actual holding time.

Proposal

3. At the end of paragraph 4.2.3.7.1 (ADR only) add a new note to read:

"The calculation of actual holding time may be waived for carriage in a portable tank when the journey of such a portable tank takes place without transloading on or from other transport modes or vehicle, without carriage by sea on a road vehicle or without intermediate temporary storage."

4. At the end of paragraph 4.3.3.5 on the right-hand column (ADR only) add a new note to read:

"The calculation of actual holding time may be waived when the journey takes place without transloading on or from other transport modes or vehicle, without carriage from or by sea on road vehicle, or without carriage from or by sea on a road vehicle or without intermediate temporary storage."

Justification

5. The calculation of the actual holding time is not easy to perform. Not only the calculation is difficult but also it requires many information which is not available at the same time. As drivers of tank-vehicles are often expected to fill the tank of their tank-vehicle or tank-container this is very difficult to achieve.

6. On the other hand the additional value can be argued as the average well insulated tank will have an actual holding time expressed in weeks rather than days, and the whole transport operation on road will be finished within a week, often only one or two days. Also, the interpretation of a journey can be discussed if after a part discharge the calculation of the actual holding time should be performed again, as the conditions as the amount of gas has changed. However, due to various consequences this is an almost impossible exercise, and it is expected that the actual holding time will not decrease due to the expansion after the discharged gas allows for sufficient re-cooling.

7. After incidents in the Netherlands the inspectorate made a survey of the actual situation around the calculation of actual holding time. In discussions with industry (see informal documents INF.10 and INF.11 of the autumn 2023 session) it emerged that the worst case was with transport by rail, where journeys could be interrupted, and tank-wagons and tank-containers carried could remain on marshalling yards undetected. Another finding was that carriage by tank-container on road vehicles where the journeys were only of very short duration the discussion arose for re-calculation of the actual holding time after partial discharge.

8. Since the Autumn 2023 session of the Joint Meeting the Netherlands forwarded informal document INF.16 to the 114th session of WP.15 as this is an issue for ADR only. In the meantime, the proposal developed into the current one. It appeared that limiting the any number of days would lead to discussion, the longest period mentioned was five days in practice. It was also felt that the definition of "carriage" allowed "intermediate storage" that may extend the journey considerably. For this reason, no period of time is mentioned but the prohibition of intermediate storage is not allowed for the exemption. Also, it was felt appropriate to make aware that journeys with a sea leg, where the carrying portable tank, tank-container or vehicle is transported by a ship should be excluded.

9. This proposal supports Sustainable Development Goal Number 8 "Decent work and economic growth".