

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods
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PROPOSAL FOR A CORRECTION OF THE TEXT IN SUB-SECTION 6.9.4.4

Information Paper from the Government of the Sweden

Summary

This proposal concerns the correction of the text of 6.9.4.4.1 to consistently use the terminology “tank” throughout Chapter 6.9.

Proposal

WP.15 is requested to accept the deletion of “or tank-container” in 6.9.4.4.1.

Justification

The old Appendix B.1c applies to “fixed and demountable tanks” and not to tank-containers. However, for the restructured ADR it has been decided to allow FRP for tank-containers also. Thus, only “tank” has been used in Chapter 6.9 in line with the definition in 1.2.1 in all places except 6.9.4.1.1. The wording “tank or tank-container” is confusing and also not correct considering the definition.

Remark

It has been pointed out to us that this new understanding is not very clear to users since “tank” is used also in the old text, but the in a restricted sense. Perhaps, in order to be “user-friendly”, it should be considered to expand at least the title of Chapter 6.9 to clearly indicate the types of tanks that are covered (cf. the title of Chapter 6.8 and the very clear text in 6.8.1.3).

Moreover it should be realized that “tank” according to the definition also includes “portable tank”. However, the introductory NOTE clearly excludes these.
