

President's Report

Dear ITCO Members,

Although the vacation period - at least in the Northern Hemisphere - may seem to be now only a faint and blurred image in the rear-view mirror, I trust you all managed to find time to relax with family and friends, and recharge the batteries ready for the traditional planning and budgeting season.

For the ITCO staff, the focus over the summer has been on preparations for the Annual Members Meeting in Houston on October 28/29. All the signals are pointing towards this being an outstanding event, with an excellent line-up of speakers and - at the time of writing - a solid level of registrations with still several weeks to go before the Meeting. We are especially grateful to our members (EXSIF, Fort Vale, Tank Service Incorporated, Silver/CIMS, Van Moer and Ovinto) who are sponsoring the receptions, refreshment breaks, and lunch. For our Southern Hemisphere friends, this will be a great warm-up event for you!

The Golf Tournament on October 28 has also been well received and this is reflected in the level of registrations. Our thanks again to the sponsors for this event (Perolo/Tank Service Incorporated, CS Leasing, DCI, and CIMC) for helping to make this both a successful and fun day.

We cannot under-estimate the importance of the role our sponsors play in ensuring the success of ITCO events, and we want to express our appreciation on behalf of all ITCO members.

Meanwhile, the 3rd ITCO Awareness Day at the Rotterdam STC was another successful event, thanks to the great organisation by Jarno Weps from EXSIF, support from Stolt, Leschaco, and Den Hartogh, and the warm hospitality from the STC Faculty.

One of the key pillars of the new ITCO Strategy House is outreach to other industry associations. We are pleased to share with the ITCO members that we attended the recent EPCA Annual Meeting in Berlin (October 7-10), including an exclusive invitation to the Dow/Essers Women in Logistics event. ITCO has also been invited to support the TT Club seminar on Tank Container risk management on November 19, and will be giving a Keynote presentation at this event.

On the project front, ITCO Work Groups have been making great progress on developing a Digital Twin for Tank Containers, facilitating the key hand-over process between tank container stakeholders, as well as the global standard Depot Audit and Assessment Scheme, designed to raise depot safety and environmental standards around the world. Our thanks to the leadership from William Leigh-Pemberton (Bertschi) and Mike Tunstall (Sahreej), as well as all the Work Group members supporting these projects. More information on ITCO's Technical and Regulatory initiatives can be found in this Newsletter. I urge you to review the content!

The ITCO Management Committee is focused on ensuring that we are delivering value to our members, and therefore has strongly supported the recently published Member Survey...it only takes 3 minutes to complete, so please let's hear from you! Feedback will be provided at the Annual Meeting, and during the next ITCO Town Hall, scheduled for December 5th.

My thanks to all the ITCO Members who have given words of support and encouragement for the ITCO programme, and I look forward to meeting many of you at the Members Meeting in Houston. It promises to be a memorable event!

My very best regards

Paul Gooch

President

president@itco.org



ITCO prepares to meet in Houston!

Over 170 delegates have now registered for the 2024 Members Meeting, taking place at the Woodlands Hotel, Curio Collection by Hilton on Tuesday October 29th, 2024

With a wide range of topics under discussion – and plenty of time for participants to contribute to the future development of ITCO – the Event looks set to be valuable, worthwhile and enjoyable.

Following the 2024 ITCO Golf Tournament earlier in the day, the Meeting will commence with a Networking Welcome Reception and Buffet for all participants on the evening of Monday 28 October.

Tuesday will begin with a “Get-Together” Breakfast. This will be followed by a Full-Day Conference, comprising a number of external speakers, as well as reports and discussion about on ITCO’s Work Groups, Projects and Activities.

The Day will conclude with a “Post-Conference” Cocktail Reception.

Morning Session: External Speakers

With Houston as our Host City, the opening presentation – “Port Houston: cargo growth and infrastructure development” – will be given by Ricardo Arias, Trade Development Manager, Port Houston, who will give an overview of the port’s current

expansion plans and channel development, together with a picture of its global trade.

This will then be followed by an overview of the challenges of tank container growth in the USA. Corey Love, Corporate Fleet Manager, Lanxess, will review some of the regulatory, technical and operational constraints affecting the industry.

Following mid-morning refreshments, Jason Carl, Managing Director, North America, PSA BDP will discuss “Supply chain solutions and digital products for the chemical industry.”

The final presentation of the morning will be given by Gary Bullock, Chief MSTC, Houston & Galveston Sector, US Coast Guard, who will consider regulatory compliance issues, safety, security and the US Coast Guard Programs.

Afternoon: Focus on ITCO in the Americas

After lunch, the focus will be on ITCO in the Americas. Lucas Luckmann, Depotrans, Santos, Brazil, will speak about: “Latin America: Challenges and Opportunities for the Tank Container business”

This will be followed by a panel discussion, moderated by Matt Caldwell (Intermodal Tank Transport), covering “Future Development of ITCO in the Americas”. The Panel will comprise: Lucas Luckmann (Depotrans), Jason Carl (PSA BDP), Corey Love (Lanxess) and Angela Chiara (EXSIF).

In round table discussions, there will be opportunity for Members to consider – and give feedback to the panel – on how ITCO can increase its presence in North and Latin America.

ITCO Projects and Activities

The final session of the afternoon will cover ITCO's current and future projects.

Thomas Tweddell, Global Fleet Manager, Royal Den Hartogh Logistics, will discuss the issue of how to develop "Global Trucking Standards for Tank Containers" – what should be the minimum standard of safety and behaviour for the road transport of tank containers.

Mike Tunstall, Managing Director, Sahreej/Kanoo Tank Services, will provide an update and development of the project being undertaken by ITCO to develop a global Tank Container Depot Audit and Assessment System. Other technical, regulatory and standards work being undertaken by ITCO will also be presented.

Practical Information: Conference Agenda, Hotel, Registration

There's still time to register for the Conference and Golf Tournament. For further information, the full Conference Agenda, Registration Information, Golf Tournament and other practical information, go to the ITCO website.

Sponsors

A big thank you to our Event Sponsors.

Conference Sponsors



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Golf Sponsors



TT Club Tank Container Seminar: 19 November

TT Club's Loss Prevention team is hosting a seminar discussion in association with ITCO on "Managing Risk in the Tank Container Supply Chain". The seminar will take place on 19 November 2024, commencing 10:30am. It will include a range of speakers, workshops and an evening drinks reception.

TT's Mike Yarwood, Loss Prevention's Managing Director, will be joined by ITCO President Paul Gooch, as well as speakers from Shearwater Law, Shoreside Law and TT Club who will be providing insight on issues including, crisis management, general average, sanctions and per- and polyfluoroalkyl substances (PFAS).

Registration

To register, click on this link: [TT CLUB SEMINAR](#)



ITCO JOURNAL

Inside this issue:

ITCO prepares to meet in Houston	2
TT Club Tank Container Seminar	3
2025 ITCO Events	4
ITCO Work Groups	7
Market Update	9
Technical, Regulation, Standards	10-13

2025 ITCO EVENTS

Feedback from Members shows a requirement for ITCO to organise three events each year, covering Europe, Asia and the Americas.

In 2024, ITCO has organized events in Rotterdam (Focus on Depots), Shanghai (Tank Container Village at transport logistic China) and Houston (2024 Members Meeting).

Plans are now being developed for the 2025 Schedule, which will include events in Antwerp, Munich and Singapore. Subject to discussions at the Houston Meeting, a regional Americas event could also be introduced.



The **transport logistic 2025** exhibition takes place in Munich, from Monday 2 to Thursday 5 June 2025. ITCO will once again be organising the Tank Container Village at the event.

Members of ITCO are invited to apply for an Exhibition Stand in the Village. To download the Stand Information Package and Stand Booking Form, click on this link: [ITCO VILLAGE](#).

As in previous events, a limited number of Exhibition Stands are available. Bookings will be handled on a "first-come, first-served" basis.

The position of each exhibitor will be confirmed at a draw to take place at the end of November 2024

To make your reservation, complete and return the form to:

- Ines Neumann: ines.neumann@meplan.de
- Kate Marszalek: secretary@itco.org

"Efficiency & Digitalisation" Conference

📍 Antwerp 📅 April 2025

With increasing focus on reducing costs and improving efficiency in all areas of the tank container business – operating, leasing, depots and manufacturing – this 1-day conference will focus on new technology and systems which can be introduced into the tank container industry.

The Meeting will also an opportunity for the ITCO Digital Twin Work Group to present the work that has been undertaken.

Initial ideas for the Conference Agenda are currently being considered. Members who wish to contribute suggestions - please contact Paul Gooch on president@itco.org

2025 Members Meeting

📍 Singapore 📅 November 2025

Recognising the critical importance of the Asian market for the tank container industry, ITCO will return to Singapore – after a 7-year gap – for its 2025 Members Meeting.

Provisional plans are for the Meeting to take place in November 2025, with a full-day conference programme, comprising external speakers and ITCO members.

Subject to demand, additions to the agenda will be incorporated, including technical site visits, etc. Members wishing to be involved in the Event, please contact ITCO President Paul Gooch – president@itco.org



3rd Tank Container Awareness Day at STC Rotterdam

Just over 50 Students from Rotterdam's Scheepvaart en Transport College (Shipping & Transport College) attended the 3rd ITCO "Tank Container Awareness Day" on 17 September 2024.

As in previous years, the aim of these Awareness Days is to give students who are beginning their 4th year at the STC a chance both to learn about the opportunities for working in the tank container industry, and to discuss possible internships – which they will need to arrange for early next year.

The day began with a welcome by ITCO President Paul Gooch who gave a background to ITCO, the tank container industry – and his own career at Dow.

Students then divided into five groups, and attended four different classroom sessions during the course of the day, while also having the opportunity to inspect the Demonstration Tank, generously provided by Den Hartogh.

In addition to the Tank Container Awareness day, the students also take the ITCO E-learning course, as part of their 4th year programme.

Paul Gooch would like to take the opportunity of thanking the speakers - John Lok of Leschaco, Wouter Wijnvoord of Den Hartogh, and Dajo Corput of Stolt Tank Containers, who offered their time (and in the case of Den Hartogh, their demonstration tank container) to lead groups of students during the course of the day.



STC Students inspect the Den Hartogh demonstration tank in the STC's training yard



John Lok - Leschaco

Our thanks also go to Tamara Sebus-Smits from STC, who arranged the course – and Paul Pigmans and Jarno Weps (EXSIF) who coordinated arrangements on behalf of ITCO.

Plans are already in place to continue this programme next year.



Dajo van de Corput, Depot Manager, Stolt Tank Containers



Jarno Weps (EXSIF) engaged students using Slido to encourage interaction

3-minute ITCO Members Survey - your Feedback Requested

Dear ITCO Member

3-minute ITCO Members Survey - your Feedback Requested
Please respond by Thursday 16 October

To ensure that ITCO continues to develop the services it provides to its Members, we are inviting you to complete a short (3-Minute) Survey.

- Members feedback is very valuable for the Management Committee, to develop ITCO's workplan for 2025 and beyond
- The Survey is anonymous – no information about individuals responding to the survey is requested
- Additional comments and ideas are also welcome
- Results will be published later this month

1. Which of the following ITCO deliverables do you consider to be most valuable for your business. Select all that are relevant for you.

Technical Guidelines

Strong response to the ITCO 3-minute Survey

Members have been asked to undertake a short (3-Minute) survey – this is to ensure that the Organisation continues to develop its Services in line with the requirements of Member Companies.

Members feedback is very valuable for the Management Committee, to develop ITCO's workplan for 2025 and beyond. The Survey is anonymous – no information about individuals responding to the survey is requested.

The Survey covers topics such as "ITCO Deliverables", the Newsletter, the Website, its LinkedIn page, future Town Hall Meetings and future ITCO events. It also welcomes additional comments and ideas.

We're pleased to report that there has been a very high level of response to the survey, with good feedback and interesting comments. Results will be presented at the Members Meeting in Houston – and then published in the next Newsletter.

If you have not yet completed the survey, please click on this link [ITCO SURVEY](#)

ITCOWORK GROUPS

ITCO Digital Twin WG: Progress Report

In the middle of last year, ITCO established a Work Group named “Digital Twin” which is one of our initiatives under the theme of Efficiency and Digitization.

Work Group members include representatives from tank container operators, lessors, manufacturers and digital service providers.

The objectives of the WG is to create a standardized digital file format containing all the key information about each ISO tank in an owner's fleet, including the structure, capacities and dimensions; certifications and standards; valves, manways and heating / cooling system provisions; exterior fittings such as walkway, ladder and cladding; and other key information.

Such a project opens the possibility of digitizing and automating the on-boarding of ISO tanks into an owner's fleet when purchasing new or when on-hiring from a lessor; as well as doing the same for the handover of tanks to various key partners with whom tank operators work every day - including deep-sea and short-sea shipping providers, hauliers, rail operators and ISO tank depots.

The first stage of this process, after the main Work Group set the agreed direction, was to assign a sub-group called the Vocabulary and Attribute Terminology Group (12 Members) who have for the past few months, in a sequence of 17 meetings, worked on creating an agreed terminology sheet covering an exhaustive list of more than 500 attributes of the ISO tank. The sub-group has also identified a smaller list of minimum mandatory items to be included, for the safe handover and operation of a tank container. This recognizes that some tank owners prefer a more basic information list, while others tend to maintain highly detailed databases. The tool must be suitable for both categories of fleet owners and all in between, to achieve maximum value for the maximum

number of Members – recognizing that (because this Digital Twin needs to on-board the existing fleet in addition to future new-builds) adoption of the Digital Twin will involve some administrative effort from existing fleet owners.

The WG leaders have been concurrently working with representatives from the Bureau International des Containers (BIC) in Paris, who presented at the ITCO Depot meeting in Rotterdam (April 2024). There may be a potential to collaborate with BIC on this project, particularly because BIC has played such a significant role in digitizing the acceptance by shipping lines of dry-box containers. The administrative effort of providing information on individual ISO tanks to shipping lines at the time of space booking, is an area where considerable time is spent by ISO tank operator staff. This time could be saved, were the process to be automated by means of the shipping lines having similar access to the tank information, via the Digital Twin.

A further update will be presented at the ITCO Efficiency and Digitization meeting, scheduled for April 2025.

ITCOWORK GROUPS

ITCO Depot Assessment WG: Progress Report

Earlier this year, ITCO established a Work Group to develop a standard global Depot Assessment procedure. Work Group members include representatives from tank container operators, depots and inspection companies.

One of the main objectives of the WG is to define minimum standards of safety, staff welfare and environmental criteria for depots, while also identifying other relevant information of interest to operators.

Individual depots will be assessed, in terms of attaining

the “above-minimum” standards by means of 3rd Party Surveyors or a review of SQAS Assessments. Members will be permitted to view which depots have had these standards assessed (or not) by means of an online platform.

The project also involves ITCO producing a Global Depot Survey, similar to the Global Tank Container Fleet Survey.

Considerable progress has already been made, with WG Members defining SHEQ requirements that will form the basis of assessment, as well as a wide range of other information and services that will be available for ITCO Members to view.

The WG will investigate the costs of setting up this facility online and the costs of administration. The fully costed and detailed proposal will then be submitted to the ITCO Management Committee for approval. On approval, an RFQ will be issued to suitable platform designers. This will be followed by development and implementation of the platform, plus identification of resources to run, monitor and assess the platform.

A number of criteria and actions have been agreed. An initial database of all depots currently being used by operators will be setup (this will not be for public viewing). ITCO will contact all of them and undertake a media campaign to encourage all depots to participate. Depots must be members of ITCO to be included on the platform.

The cost of 3rd Party Inspection will be covered by the depot, plus an ITCO administrative fee, with the assessment validity for three years (or the validity of the SQAS).

It has been agreed that the running of the platform is to be self-financing after initial set-up.



Key takeaways from EPCA 2024

ITCO President Paul Gooch reports on the recent 2024 EPCA Annual Meeting in Berlin in early October.

With some 2900 registered delegates (and probably a similar number of “unregistered” folk working the hotel lobbies), EPCA is still The Place to Meet for the chemical industry.

There were several underlying themes in the conference: DEI, sustainability, decarbonisation, European lack of competitiveness in energy and feedstocks, and the China factor. Unfortunately, there was not much discussion about green shoots – the general feeling was that recovery is unlikely before 2026.

One exception was a comment from ICIS that chloralkali could see growth in 2025, driven by caustic soda into aluminium for solar, EVs, and batteries. One of the “unfortunate” consequences of the recent hurricanes in the US is that Chlorine could benefit from the clean-up and reconstruction.

ITCO participated in the Dow/Essers sponsored Women in Logistics workshop which demonstrated a high degree of enthusiasm and commitment to change. This gave me the opportunity to catch up with former Dow colleague Cathy Budd (CPO) who gave an excellent speech on the role of positive mentoring and coaching in her career.

MARKET UPDATE

In addition to our general ITCO Update and our Technical Report, we are now introducing a new “Market Update” section in the monthly ITCO Newsletters

The ‘D’ Factor...

There’s no question that the current ‘topic of the month’ is China - and the impact that the 3 ‘D’s’ - Chinese Debt, Demographics, and Demand (or over-supply) - is having on the global chemical industry.

We are still living with the impact of the Evergrande moment on the Chinese market, and probably the global economy as a whole. On the theme of ‘D’, we also cannot overlook the Draghi industrial policy initiative, and whether the political resolve, and the finances are in place to make that happen.

According to John Richardson of the market intelligence specialists ICIS: “Let’s be frank, the global chemicals industry is going through the most profound set of changes in its modern-day history. Nobody knows all the details of the changes that will be permanent. Anybody who claims they do know will lead you down a path away from essential scenario planning. We do know that in this world of flux and chaos at a micro level, the following macro trends are here to stay: Sustainability, ageing populations across most of the G20, much more volatile geopolitics, ever-greater economic, social and political disruptions caused by climate change and the end of debt bubbles”.

Operators of naphtha crackers in Europe remain weighed down by high feedstock costs, with weak cracking margins close to five-year average lows, according to S&P Global Commodity Insights. “In August, US ethane producers had the lowest ethylene production costs in the world because of cheap ethane ... in contrast with very expensive [Asian and European] naphtha.”

As an illustration of the challenges facing the European chemical industry, ADNOC Group’s agreement to buy Covestro highlights the challenges and opportunities facing Europe’s beleaguered chemical industry.

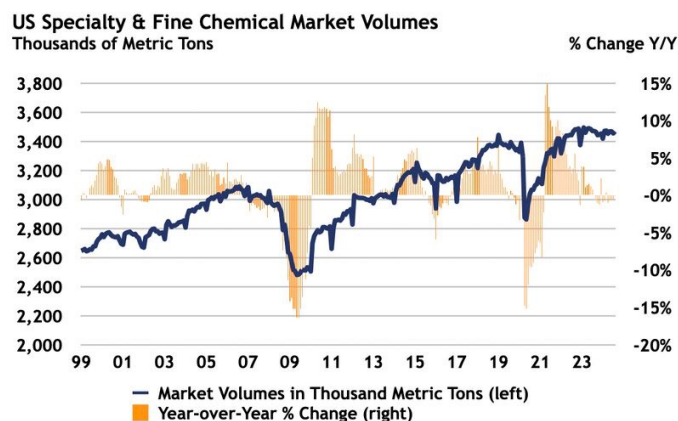
State-owned Abu Dhabi National Oil Co. (Adnoc) has agreed to buy Covestro AG (Leverkusen, Germany) for a total of €14.7 billion, including debt, after more than a year of negotiations between the two companies. Covestro is the global leader in polycarbonate (PC) and polyurethanes (PU), but its operating profit slumped from around €3bn in 2021 to near €1bn in 2023. Adnoc’s cash bid of €62 per share values Covestro at approximately €11.7 billion, according to a statement issued by Covestro.

Including about €3 billion in debt, the total bid by Adnoc equates to about €14.7 billion. In 2023, Covestro generated sales of €14.38 billion, down 20% compared with the previous year, and a net loss of €198 million, which narrowed from a loss of €272 million in 2022.

Meanwhile, BASF, the home of the Verbund model, is reported to be preparing its agriculture business for an IPO as it grapples with a challenging business environment in Europe. However, it’s not all bad news. Specialty chemicals (also called “performance chemicals” or “specialties”) are produced in low volumes - but with very high purity standards - for a small number of customers, and are ideally suited to tank containers.

Growth in US specialty and fine chemicals during the past 20 years has generally been upwards, rising from 34.0 million tons in 2003 to 41.3 million tons in 2023 with a value of \$252.6 billion.

US specialty chemical and fine chemical volumes edged up 0.4% to 3.47 million metric tons during August. This is a level that was off 0.1% compared to a year ago but still above pre-pandemic levels. Gains among segments were mixed, with 19 out of 30 market segments expanding in August.



Source: Thomas Kevin Swift, ICIS

TECHNICAL REGULATIONS STANDARDS

RID/ADR Joint Meeting September 2024

Elimination of dual approval of Intermodal Tanks under chapters 6.7 and 6.8 of RID/ADR

Following the two Intercessional Meetings on Dual Certification in July, ITCO presented two papers to the September RID/ADR Joint Meeting – in which it listed, in detail, the reasons why industry employs dual certification.

ITCO explained how operators and tank owners would lose considerable flexibility in working on deep sea routes with UN Portable Tank Regulations (Ch 6.7) but with the option to work the more flexible RID/ADR (Ch 6.8) rules for land-based dangerous goods transport, when required.

Using a single intermodal tank for two different markets has environmental and sustainability benefit as well as increased safety.

The reasons why this is important to ITCO are as follows:

1. Dangerous Goods lists do not overlap exactly, so dual certification gives industry a wider range of work immediately available. In addition, land-based regulations allow bottom discharge operations on more products than do UN Portable Tanks.
2. Some products have a higher fill ratio (up to 3%) with RID/ADR Ch 6.8, provided burst discs precede SRVs (hermetically sealed).
3. We estimate industry has in the region of 600,000 dual certified tanks; and removing one or other accreditation from each one over 2.5 years would be an horrendous task. The original France Paper proposed this eventuality with no transitional arrangements to continue the use of pre-existing dual certified tanks.
4. Dual Certified tanks have maximum flexibility when routes include a “short sea” transit.
5. Many of our customers prefer us to operate under RID/ADR Ch 6.8 rules so that their business processes involving large numbers of deliveries and dispatches alongside road tankers are all conducted under one legislative regime. Less variety, less training, more safety!
6. If all intermodal tanks are forced to become UN Portable Tanks, there will be very significant reductions in flexibility of swap tanks which are thinner and will then have significantly restricted product lists.
7. Swap Tanks should be supported by regulators because they provide the means to migrate more freight to rail which is a central issue on EU environmental policy to reduce greenhouse gasses to a specific target.
8. The paper also contains some proposals regarding mitigating actions that may be applied if regulators proceed with a ban in later meetings.

The intercessional meetings heard complaints regarding enforcement agencies being confused about which regulation was being applied at any one time when enforcement checks were being made.

Therefore, ITCO also provided a second paper (INF 10) proposing that a statement clarifying which regulation was applied to any transit, would be annotated on the dangerous goods note. Although some experts expressed support, others did not support it, as it was felt too early and should be considered with the issues raised in the main paper.

The Working Group on Tanks considered the main document (INF 9) to be valuable and took note of its findings. After a long discussion, France offered to develop a working document for the next session to put forward options for addressing the points raised.

ITCO plans to be in attendance for the meeting on 24 -28 March 2025. There will be no dual certification changes in the 2025 RID ADR editions and therefore any changes adopted will become effective January 2027.

France remains committed to restricting the dual certification environment, but ITCO is making representations that encourage changes to be reasonable and justified.

Approved Inspection Body Powers

ITCO provided another paper (INF 24) opposing a France proposal to create an exclusive right for an Approved Inspection Body (accredited to act for RID/ADR competent authorities), to be the only entity to be permitted to qualify welding and NDT personnel for tank container new build, maintenance and repair.

Our paper, taking a similar approach to that of EIGA and some competent authorities, effectively defended the status quo. The Working Group on Tanks proposed wording for future consideration which explained the status quo in simpler terms. No changes were adopted at the meeting.

UN Model Regulation UNSCTDG Meeting November 2024

There is only one paper of interest to the membership currently posted on the UNSCTDG meeting. This is regarding cryogenic tanks for the transport of deeply refrigerated flammable liquefied gases. Germany is proposing to follow up a change already made in RID/ADR as follows:

At the end of 6.7.4.5.2, add the following note:

"NOTE: Filling and discharge openings also include the openings in the vapour phase of the portable tank that are used for vapour recovery."

This relates to a requirement to automatically shut off all vapour and liquid phase valves in the event of a driveway.

If any ITCO Members have any feedback or difficulty on this proposal, please let me know as soon as possible.

Polymerising substances

Cefic brought an update on the work of the informal correspondence group on polymerising substances and self-accelerating polymerisation temperature (SAPT) and noted the lack of definition of what is a 'polymerising substance' and a need for better distinction between stabilised and non-stabilised polymerising substances.

The paper pointed out that the SAPT is appropriate for non-stabilised polymerising substances, whereas the polymerising induction time (PIT) is relevant for stabilised polymerising substances. Temperature control is appropriate for non-stabilised polymerising substances, but its importance for stabilised polymerising substances is still being investigated. The Work Group is still discussing what is a reasonable PIT and at what temperature.

ISO TC 104 Freight Containers

Revision of ISO 1496-3:2019 (Tank containers for liquids, gases and pressurized dry bulk)

ISO TC 104/SC2 voted in April 2024 to start work on a full revision of our industry standard.

The Working Group ISO TC104/SC2/WG4 held its first meeting on 20 August 2024. WG 4 is Chaired by Colin Rubery (BSI). Mike Himbury (WG 4 member, also from BSI), guided the meeting through the 41 proposals to resolve errors, corrections and make improvements.

Most of the proposals were agreed by the Working Group with three further items to be resolved:

1. Whether MEGCs are included in the scope for this standard. (Possible ISO ballot to decide).
2. Further consideration should be given to the benefit of creating an informative annex on Interface Connections for Tank Containers. WG4 doubted the value of this.
3. Guidance to be provided in the standard for permitting reduced ratings for dedicated low specific gravity payload tank containers.

If any members of ITCO wish to volunteer any opinions on these proposals please submit a request, either to me by email, or through their national standards body (NSB) for those countries who elect to be Participating Members in the standard work. It would be a good thing if more members could engage with their NSBs to provide valuable expertise in the ISO committee forum.

Michael Himbury
himbury@itco.org

Update: Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) restrictions

The European Chemicals Agency (ECHA) and associated groups - Risk Assessment (RAC) and Committee for Socio-economic Analysis (SEAC) - are currently reviewing the proposed restrictions of the use of PFAS materials within the European Union. PFAS includes fluoropolymers such as PTFE that are used for the manufacture of tank container seals and gaskets.

The reviews of data and the consultation process take place on a categorised industry basis. The Transport category, which is expected to include tank containers, had been rescheduled for debate in November but may be postponed until Spring 2025. Transport covers a wide range of activity. The review might not, at this stage, drill down to issues that affect tank containers.

ITCO has worked with UIP* to prepare a briefing paper that can be used by ITCO Members, as part of a lobbying initiative to contact their national ministries and other interested parties.

The draft paper is shown in the article below.

Note that a detailed paper, setting out the case for allowing continued use of solid-state fluoropolymers, was published by ITCO in 2023 (TG-09)

At EU level, UIP will provide the paper to the European Commission, DG MOVE (road safety unit aligned to ADR-RID) and to DG GROW (unit dealing with Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)).

The ITCO Environmental WG will be meeting to discuss PFAS matters and more. An announcement of the meeting date will be circulated in the coming weeks.

**UIP - International Union of Wagon Keepers, is the European umbrella association of 14 national associations and represents more than 250 private freight wagon leasing companies and Entities in Charge of Maintenance*

Quiz Question

1. Within IMDG Portable Tanks where is the provision to determine the degree of filling?

- Dangerous Goods List
- Tank Special Provisions
- Portable Tank Instructions

2. This tank marking includes 22K2.



What is the meaning of:

- 22
- K2
- T11
- [4]

Please send your answers to Colin Rubery, ITCO Technical Secretary, on rubery@itco.org

PFAS restriction proposal Risk to safe transportation of chemicals and liquefied gases in the European and Global supply chain

The European transport of chemicals is of major importance to the continent's economy. EU chemical production amounted to 760 billion Euros in 2023. There is an extensive movement of chemicals within and outside Europe to meet industrial and consumer demands. Safety and prevention of leakage during transport is crucial.

Rail, road and intermodal container transport of bulk liquids and gases is a specialist industry. It requires the use of solid-state fluoropolymers because of the critical role of the material in sealing and leak prevention of chemical and liquefied gas tanks.

UIP and ITCO is requesting ECHA to designate solid state fluoropolymers (such as PTFE, PFA, PVDF, FEP, FKM, FFKM) in sealings for tank containers and tank wagons for indefinite derogation.






Key messages:

- Tank transport of chemicals and liquified gases, in conformance to UN and RID-ADR regulations for dangerous goods, should be recognised as an essential sector of transport within the ECHA PFAS reports.
- Safety is paramount and tank transport should be prioritised in the assessment of the PFAS restrictions.
- Solid state fluoropolymers are unique materials used for tank sealing applications to prevent leakage of liquids and gases during transport in EU territories.
- Solid-state fluoropolymers sealings of tank containers and tank wagons should be exempted from restrictions because no alternative materials provide the requisite properties.
- The "repair-as-produced" principle should be applied in the transport sector, with indefinite derogations for spare parts, refurbished or remanufactured parts, equipment, and products already placed on the market.

Sealings of tank containers/wagons are essential for the transportation of dangerous goods

- Solid-state fluoropolymers, (such as PTFE, PFA, PVDF, FEP, FKM, FFKM) are used in sealing elements of the tank valved closure in tank wagons and tank containers and sometimes as coatings inside of the tank.
- Reliable sealing materials are paramount for safety and leak tightness of regulated dangerous goods transport.
- No alternative sealing element materials, existing or under development could provide the essential range of properties, including chemical resistance, thermal stability, shrinkage, elastic recovery and vibration resistance.
- Solid-state fluoropolymers enable tank wagons and containers to be efficient multichemical units. The forced use of inferior and less safe sealing materials would lead to restrictive use, and consequential empty runs and inefficiency which would increase environmental emissions. Furthermore, frequent seal and gasket maintenance increases chemical exposure risk to workshop personnel.
- There is no emission of PFAS to the environment during the use phase because sealing materials are solid state and incorporated into the tank.
- Mainly during the mandatory RID-ADR maintenance check, sealings are replaced during the full check-up (8 years) or earlier if needed (4 years during intermediate check-up).
- At the end of service life the materials could be separated and disposed in a different manner if required. Industry supports developing recycling facilities.

IMPACT OF AN IMMEDIATE PFAS BAN

-  Higher risk of leakages of dangerous goods into the environment
-  Higher emissions of toxic and dangerous products
-  Higher risk to human health in workshops
-  Severe disruption of global chemical and liquefied gas transportation supply chain
-  Inhibits the transport certain products, leading to shortage of products of basic needs

ITCO is the trade association for companies engaged in the global transport by road, rail, and sea of bulk liquids and liquified gases by intermodal tank container (www.international-tank-container.org).

UIP - International Union of Wagon Keepers, is the European umbrella association of 14 national associations and represents more than 250 private freight wagon leasing companies and Entities in Charge of Maintenance (www.uiprail.org).