

President's Report

Dear ITCO Members,

The year is passing by quickly - and much of ITCO's focus is currently on the Tank Container Village at the **transport logistic China 2024** exhibition (25-27 June); and preparations for the Annual Members' Meeting in Houston on 28/29 October.

Discussions have already started on the 2025 programme - as it has become clear that suitable venues for ITCO events need to be booked at least a year in advance.

In the meantime, we have made excellent progress based on the initiatives put in place at the beginning of this year.

- The Management Committee has a full agenda as it considers the implications of the new organisation on our Rules of Administration, Membership Criteria, and elections.
- We have a full project programme underway with the Digital Twin, Depot Audits, and on-going technical reviews.
- Our first Town Hall meeting is scheduled for June 6, 2024, and the initial level of registrations has been excellent.

We are also pleased to report that the ITCO Depot Meeting in Rotterdam, on April 18/19 was a resounding success, with approximately 140 registered attendees from around the world, a packed and varied agenda, and good networking opportunities. Our thanks go to Kate and Patrick for the excellent organisation, to the speakers for their high-quality presentations, and most of all to our members who showed their support in numbers and through their positive feedback.

Finally, just as a 'heads-up', ITCO will be featured in the next edition of Bulk Distributor which will be available in time for the Shanghai exhibition.

Thank you for your continued support.

Paul Gooch

President

president@itco.org



ITCO Tank Container Village at transport logistic China (see p4)



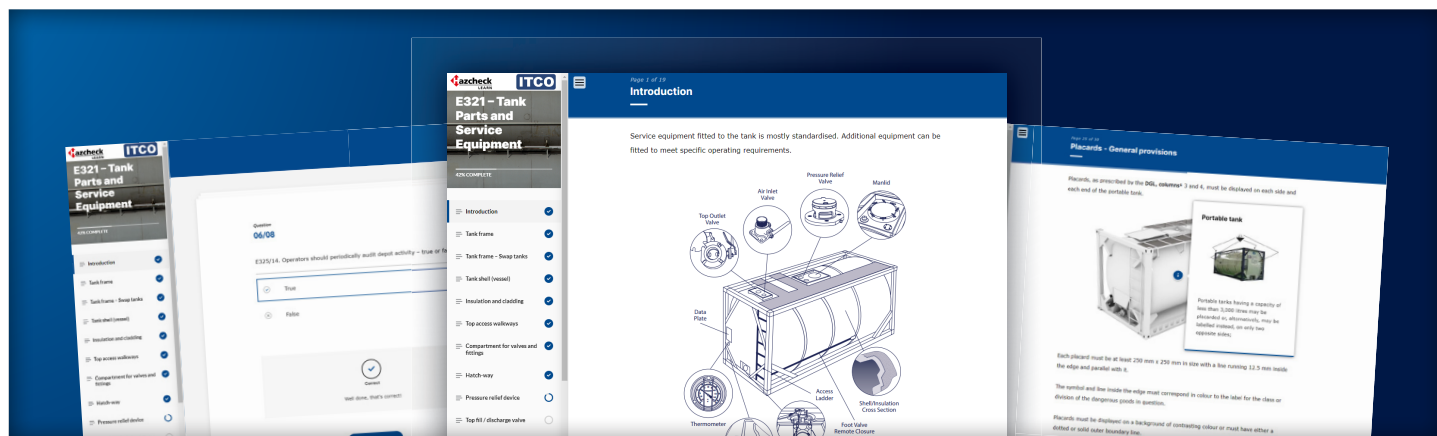
The Woodlands, Houston – venue for the ITCO 2024 Members Meeting (see p4)

ITCO JOURNAL

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E: secretary@itco.org



ITCO Tank Container e-learning course

First introduced in 2017, the ITCO Tank Container E-learning Course has recently undergone a review – with the aim of making it more concise and user-friendly.

It has also been restructured so as to fit a new e-learning technology authoring tool - which provides a more modern framework and an updated appearance.

How to access the Course

The Course is available via this link:

<https://hazcheck.com/product-category/tank-container-e-learning/>

The Tank Container E-learning Course was written and developed by ITCO - and produced and marketed by NCB Hazcheck.

The Course aims are to enhance the safe, competent and efficient use of tank containers by providing a comprehensive awareness of the tank container to enable users to contribute to its safe, competent and efficient use.

Benefits of the Course

The benefits of the Course are as follows:

- Cost-effective and flexible – fraction of the cost and less disruptive than classroom learning

- Efficiency – consistent training standards across global operations
- Certificate – course completion certificate is provided as a record of training

Course content

The course offers guidance on the safe operation of tank containers covering:

- Introduction to tank container types and their use, safety features and environmental sustainability.
- Tank parts and service equipment and their purpose.
- Regulations – use of the IMDG Code and the process to determine the appropriate Portable Tank Instruction and Tank Provision, degree of filling and provisions relating to placarding and marking.
- Tank operator's transport plan – sets the course content and studies in the context of a case study of an operational transport plan.
- Tank depot processes when moving a tank in/out of a depot facility.
- M&R – introduces tank cleaning processes, damage estimate preparation and acceptable container condition, Inspection and test.

Further information: contact NCB-Hazcheck for all information concerning the course (support@hazcheck.com)



Focus on key industry issues at Rotterdam Depot Conference

Over 140 participants attended the ITCO Members Meeting in Rotterdam on Friday 19 April 2024.

After a Welcome Reception on the eve of the Event, the full-day Conference focused on a number of critical issues relating to Tank Container Depot operations, including Safety, Efficiency, Sustainability and Investment.

Also covered in the Conference was the development of a Global Tank Container Depot Audit and Assessment programme. A Work Group for this project has been established.

The Event concluded with a Post-Conference Reception. Presentations made at the Conference are available for Members to download.



ITCO President Paul Gooch introduces the Tank Container Depot Audit Work Group



A wide range of topics relating to Depot operations were discussed at the Rotterdam Meeting

Logistics: Good News...

Panama Canal transits are almost back to “pre-water crisis” levels again which will start to ease pressure in that part of the world.

Drought conditions at the Panama Canal are expected to end soon, with normal operations resuming by 2025, according to canal officials quoted by Freight Waves. Around half of all container volumes from China and East Asia pass through the 80km Panama Canal to the US East Coast.

The state-owned Panama Canal Authority (ACP) had now signalled a return to normal operations, allocating three extra transit slots to Panamax vessels on 25 March - bringing the total number of reservations to 27/day, the report said. The man-made Gatun Lake, which supplies the canal's water supply, had been boosted by recent rainfall, leading to an increase in traffic. According to forecasts by the US National Weather Services' Climate Prediction Centre, the region's warm and dry El Niño conditions were expected to end in the coming months and there was a 60% chance of La Niña conditions developing by August, which would bring cooler temperatures and potentially increased rainfall.

...and not such good news

Sea-Intelligence has released the latest edition of the Global Liner Performance (GLP) report, featuring schedule reliability data up to March 2024.

The report of the Danish shipping data analysis firm encompasses schedule reliability across 34 trade lanes and over 60 carriers. As round-Africa routings return to normal and carriers' service networks stabilize, there has been a noticeable improvement in schedule reliability.

In March 2024, the figure rose by 1.6 percentage points month-on-month reaching 54.6%. (President's note: “I don't consider that a noticeable improvement!!”)

In an update to customers Maersk said the complexity of the situation in the Red Sea had increased in recent months.

“To safeguard our crew, vessels, and your cargo, we are rerouting around the Cape of Good Hope for the foreseeable future. However, the risk zone has expanded, and attacks are reaching further offshore,” Maersk said.

All set for Shanghai Exhibition

The *transport logistic China 2024* exhibition takes place at the end of June. Once again, ITCO is organising the Tank Container Village within the event – and this year our presence will be stronger than ever.

All 24 booths in the ITCO Village have been sold – and we are expecting a busy three days, where visitors and exhibitors can meet to discuss business opportunities.

ITCO Members, prospective Members, customers and industry colleagues are warmly invited to visit the exhibition stands and meet their business partners.

The Event takes place from Thursday 25 to Thursday 27 June 2024, at the Shanghai New International Expo Centre (SNIEC).

Further visitor information is available on: <http://www.transportlogistic-china.com/trade-fair/visitors/ticket/>

ITCO Members exhibiting in the Tank Container Village

- Advanced Polymer Coatings
- Bertschi Chemical Logistics Center
- Bertschi Global Transport
- Bureau Veritas
- CIMC Safeway Technologies
- CS Leasing
- Den Hartogh Global
- Depot Connect International
- Eltherm
- Eurotainer
- EXSIF
- Fort Vale Engineering
- Grande - Tek Flow Control
- Lamilux Composites
- Legend Logistics
- Nantong Tank Container
- NewPort China Tank Containers
- OPW Fluid Transfer Solutions
- Perolo SAS
- Raffles Lease
- Seaco
- Shanghai Pacific International Container
- Triton Container International
- Zodiac Tank Container Terminals

ITCO 2024 Members Meeting

The date and venue for the 2024 ITCO Members Meeting have now been confirmed.

The Conference will be held at the Woodlands, Houston on Tuesday 29 October, with a wide range of topics relevant to Members being included in the Agenda.

There will be a Welcome Reception for all participants on the evening of Monday 28 October.

Earlier in the day, there will be the opportunity for delegates to participate in a Golf Tournament.

Further details, including Registration and Hotel Rooms, will be announced shortly.

Town Hall Meeting for all ITCO Members

Thursday 6 June 2024 at 14:00 CEST

Arrangements are in place for the ITCO Town Hall meeting, taking place on Thursday 6 June at 14:00 CEST – thank you to all members who have already registered.

ITCO President Paul Gooch will present information about ITCO's future strategy, together with details of current and planned Technical Projects and Future Events. There will also be an update on changes to ITCO's Administration and Management structure.

Members will be invited to submit questions in advance – while there will also be the possibility of questions during the call.

The meeting is scheduled to last a maximum of one hour. A recording will be made available afterwards, for those unable to attend.

If you have not yet registered to participate, you can do so by clicking on this link: [ITCO TOWN HALL MEETING](#)

MARKETUPDATE

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

News from Chemical Week

After some slow and tentative steps, Europe's rationalization in chemicals is moving into high gear.

LyondellBasell Industries NV has launched a strategic review of its European olefins & polyolefins and intermediates & derivatives business units. In April, ExxonMobil Corp. and Sabic separately announced decisions to close steam crackers at Notre Dame de Gravenchon, France and Geleen, the Netherlands, respectively, citing financial losses and challenging petrochemical market conditions in Europe.

The announcements mark the start of much-needed capacity rationalization. The shutdowns will eliminate nearly 1 million metric tons per year (MMt/y) of ethylene capacity, just 4% of the total available in Western Europe. But it signals the start of a process that could start to address Europe's cost disadvantage and bring supply into better balance.

Market conditions in Europe are expected to remain challenging over the long term exacerbated by the impact of European regulations. In addition, Trinseo has announced its intent to potentially close its 500,000 metric tons per year styrene plant at Terneuzen, Netherlands.

Europe's chemical industry has reached a crossroads, facing an urgent need for rationalization. The path ahead is becoming clearer. Europe is a large and sophisticated market, but it is not growing and is well oversupplied. Circular, low-carbon and differentiated materials will make the cut in Europe, but the extent of what else will be viable remains to be seen.

Meanwhile, Shell PLC has announced that its affiliate Shell Singapore Pte. Ltd. has reached an agreement to sell its integrated refining and petrochemical assets to CAPGC, a joint venture majority owned by petrochemicals producer PT Chandra Asri Pacific Tbk (Jakarta, Indonesia) and minority owned by commodities trader and producer Glencore PLC (Baar, Switzerland).

FRP Portable Tanks

The UN Sub-Committee Experts on the Transport of Dangerous Goods is meeting in Geneva (24 June to 3 July 2024).

Now that UN Portable Tank regulations include FRP Portable Tanks for liquid transport and is about to adopt the final draft on FRP Service equipment for FRP and metallic tanks, the Russian Federation have submitted a full draft proposal for FRP Portable Tanks for the transport of Class 2 Non-refrigerated gases for adoption.

[ST/SG/AC.10/C.3/2024/19]

Seals and gaskets: restrictions to manufacture and use

The European Chemicals Agency ECHA is considering restrictions on the manufacture and use of range of 9000 perfluoroalkyl and polyfluoroalkyl substances (PFAS).

PFAS chemicals include fluoropolymers such as: PTFE Polytetrafluoroethylene (PTFE) trade name (Teflon) are essential materials used in seals and gasket manufacture.

The range of essential properties includes leak tightness, chemical resistance and compatibility, thermal stability, durable, shrinkage, elastic recovery, vibration and friction resistance, cutting, machining and extrusion - capabilities which are not present in any other material.

Without PTFE, seal and gasket performance will be impaired and there is a risk of in-service leakage and reduced compatibility.

Moreover, existing UN Portable Tank valves are designed, tested and approved for fluoropolymer seals and probably it will not be possible to simply insert an alternative material – if such a suitable material were to be developed. Not least, with tanks in-service for 20-30 years there would be a huge task to re-approve these valves. Practically, many existing valve sets could become obsolete.

Schedule of implementation

There are many unknowns - consultation dates, decision dates, transition dates and derogations that might apply.

Whereas the potential implementation might be some years in the future, the threat to the tank industry requires that ITCO engage in the process - as far as is practical and when the opportunity arises – and be prepared to put a case for protection of the safety performance of tank containers.

European Chemicals Agency (ECHA)

ECHA scientific committees for Risk Assessment (RAC) and for Socio-Economic Analysis (SEAC) announced in March that they will evaluate the proposed restriction, together with the comments from the consultation in batches, focusing on the different sectors that may be affected.

March 2024

- Consumer mixtures, cosmetics and ski wax
- Hazards of PFAS (only by RAC)
- General approach (only by SEAC)

June 2024

- Metal plating and manufacture of metal products
- Additional discussion on hazards (only by RAC)

September 2024

- Textiles, upholstery, leather, apparel, carpets (TULAC)
- Food contact materials and packaging
- Petroleum and mining

Note that the announced sectors are “high-level”. Tank transport (containers, rail and road) is not currently identified as a category, even in the in the previously identified transport industry sector.

EU Parliament

Once the ECHA have concluded the process, a recommendation will be submitted to the where final decisions will be made. The EU process could take up to 5 years.

Antwerp Declaration for a European Industrial Deal

It appears that the European Industrial Deal is gaining traction and maybe a factor in maintaining access to essential materials.

In February, 73 industry leaders from nearly 20 sectors came together to warn that “sites are being closed, production halted, people ‘let go’- and that Europe needs a business case, urgently.”

European Commission President Ursula von der Leyen and Belgian Prime Minister Alexander De Croo, whose country holds the rotating Council presidency of the EU, both attended the signing ceremony and received the Declaration.

It was noted that Fluoropolymers are irreplaceable in many cutting-edge technological sectors crucial to keeping Europe prosperous and innovative. These sectors include aerospace, the automotive industry, electric batteries and semiconductors, among others.

ITCO's actions

ITCO's task, at present, is to engage in the process; and, when the opportunity arises, to put a case for protection of the safety performance of tank containers.

ITCO has so far:

- Engaged in the ECHA consultation process and submitted a case study and a paper supporting the tank container industry.
- Cooperated with UIP (International Union of Wagon Keepers) and worked on a joint paper to submitted to the EU commission.
- Monitored The Plastics Europe Fluoropolymers Product Group, which is a trade association for the leading chemical manufacturers, and provide PFAS monthly updates.
- Urged members to participate in the safe-disposal and eventual recycling of seals and gaskets. Not least, this responsible and practical programme could become a feature of the tank industry case to submit to the authorities as an alternative to banning the materials.

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

In 2023, France proposed to eliminate the option for owners of standard intermodal tanks to dual certify RID/ADR Chapter 6.7 Portable Tanks (for example T11 Portable Tank Instruction) with RID/ADR Chapter 6.8 Tank Containers (for example L4BN Tank Code). Unlike typical regulatory amendments which only affect new build tanks, this proposal is targeted at “in service” intermodal tanks. France proposes that the owner of the container nominates only one of the dual approvals at each tank’s next intermediate inspection. ITCO published a paper stating that this change would affect a huge number of intermodal tanks (possibly over 70% of ITCO’s manifest) over the two and a half years, and broadly estimated an industry cost of €48 million in modifying data plates and markings. It would also be a significant management challenge to assess and decide which regulatory approval to sacrifice on each and every dual certified intermodal tank in a compressed time frame.

In the Autumn 2023 session, ITCO offered to organize two intersessional meetings to identify all the issues and consequences that may arise from such a complex change. ITCO duly provided a report of the meetings to the March 2024 Session and it has now been requested again to “develop a list of issues that need to be addressed in order to enable a smooth transition for industry if dual approval should no longer be permitted”.

It should be noted that the RID/ADR Working Group on Tanks has already moved forward on two issues which disadvantaged UN Portable Tank use when compared to RID/ADR Tank containers.

1. Bottom discharge restrictions on Portable Tanks: Portable Tanks (Ch 6.7) are limited to top discharge operations on many products, (many of which are corrosives), even when operating on land (road or rail) whereas Tank Containers (Ch 6.8) are permitted to use bottom discharge as a matter of course. France has made an initial proposal to redress this difference for road and rail applications. (Reference INF 29 dated 12th September 2023 at the RID/ADR Autumn Meeting and ECE/TRANS/

WP.15/AC.1/2023/46 both from France).

2. It was reported that some RID/ADR territories refused to allow the use of IMDG approved UN Portable Tanks within their territory. A refusal to accept IMDG Ch 6.7 approved Portable Tanks to operate in RID/ADR territory is proposed to be eliminated as follows:

- “Adoption of Proposal 9 (for RID/ADR 2025) Portable Tanks

In order to ensure UN Portable Tanks, have full access to being operated in RID Contracting States and/or Contracting Party to ADR, the following regulation is adopted for 2025. Amend the note 2 after the heading of Chapter 4.2 to read (new wording in bold, underlined):

*“NOTE 2: Portable tanks and UN MEGCs marked in accordance with the requirements/the applicable provisions of Chapter 6.7 but which were approved in a State which is not an RID Contracting State / Contracting Party to ADR **or approved in accordance with Chapter 6.7 of the IMDG Code** may nevertheless be used for carriage under RID/ADR.”*

ITCO is now preparing for further intersessional meetings in the next three months to explore other ways in which problematic issues may be addressed in order to enable a smooth transition for industry if dual approval should no longer be permitted.

The following list is being compiled for discussion at RID/ADR Intersessional Meetings organised by ITCO this summer.

If you have any comments on these or indeed other issues that should be considered under this remit, please get in touch. ITCO will advertise the Intersessional Meetings for those interested in participating. Contact Mike Himbury on: himbury@itco.org

1	<p>Can we resolve problems which have given rise to the call for a ban on dual certification?</p> <ul style="list-style-type: none"> a. High Inspection Costs for RID/ADR tanks. Can Industry absorb higher costs from RID/ADR Inspection Bodies in supervising recently enhanced RID/ADR Ch 6.8 intermediate, periodic, and exceptional inspections on a global basis? b. Harmonise Inspection timings between Ch 6.7 and 6.8 c. Harmonise Exceptional Inspection rules for modification e.g. changing T12 to T11 d. Clarify Data Plate marking to confirm approval to RID/ADR Ch 6.8
2	<p>Two Type Approvals and one Operational Certificate</p> <p>Can regulations be adopted which allow dual certified Type Approvals but with operations restricted to a single code (Inspection Certificate and markings) at any one time? Thus with an exceptional check it would be possible to swap one code for another and back again if circumstances change.</p>
3	<p>Aggressive Time Scale</p> <p>The proposal for implementation on every tank within 2.5 years is very aggressive. Can this be mitigated?</p>
4	<p>Minimise work required to remove one code from a dual certified Tank.</p> <p>Is it possible to re-accredit a tank by limiting any physical changes to marking (decal) only, and not require modification or replacement of data plates?</p>
5	<p>Hermetic Sealing</p> <p>Requirements for hermetic sealing of tanks can be different between the 2 codes. (Will this feature cause any specific problems from ITCO members in restricting tanks to one code only?)</p>
6	<p>Harmonise Bottom Discharge rules for land-based transport (France Proposal)</p> <p>Can France complete their work on proposing relaxation to the UN Portable Tank rules specifying “top discharge only” in cases of land mode use (road/rail) where Ch 6.8 rules allow bottom discharge?</p>
7	<p>Products that feature in one tank code but not the other.</p> <ul style="list-style-type: none"> a. There are over 60 products with 6.8 tank codes but no T code. b. There are also a number the other way. <p>Banning dual certification would mean that whichever configuration is chosen, some products could not be carried unless these omissions are harmonised</p>
8	<p>Customer adoption of UN Portable Tank regulation transactions</p> <p>Can we assist customers operating RID/ADR Ch 6.8 goods inwards/outwards quality, health and safety management systems who are reluctant to deviate from this system?</p>

ISO 1496-3 Series 1 freight containers — Specification and testing — Part 3: Tank containers for liquids, gases and pressurized dry bulk.

ISO TC 104/SC2 voted in April 2024 to start work on updating our industry standard and the working group ISO TC104/SC2/WG4 is due to hold its first meeting this summer. The WG will initially work through the 41 proposals to resolve errors, corrections and improvements.

If any members of ITCO wish to access these early proposals please submit your request. Contact Mike Himbury on: himbury@itco.org