



ITCO November 2019 Newsletter *and Technical Report*

A. ITCO November 2019 Newsletter

This month:

- 2019 Asia Regional Meeting: Shanghai, 27 November
- @TCO/ITCO Workshop, Shanghai
- Tank Container to Shanghai Maritime University
- Book your stand at ITCO Tank Container Village – Shanghai, June 2020
- ITCO 2019 Members Meeting – Report Published
- Environment Work Group: Two Initiatives
- IT/Telematics Work Group: Progress under way
- CDI Publication: “Packaged Chemicals by Sea: Risk Mitigation”
- E-learning Reminder: Two Free Courses for Each Member
- Membership Criteria: Reminder of application process
- ITCO on Twitter

1. Register now for ITCO Regional Meeting, Shanghai - Wednesday 27 November

ITCO is organising its 2019 Asia Regional Meeting at the [Pullman Skyway Hotel, Shanghai](#), on Wednesday 27 November 2019.

The Meeting will comprise a full afternoon Conference Session, followed by a Cocktail Reception and Networking Buffet Dinner. Over 50 participants have already confirmed their attendance.

To register, please click here: [REGISTER](#).

To view the Conference Agenda with Topics, click here: CONFERENCE AGENDA

Special room rates are available at the Pullman Skyway. Further information, click here: [HOTEL](#)

Many thanks to CIMC, the Event sponsor.



2. @TCO/ITCO Workshop, Shanghai

On the morning of Wednesday 27 November 2019, the 2nd Asia @TCO/ITCO Depot Workshop will take place at the [Pullman Skyway Hotel, Shanghai](#) commencing 10:00am.

The Workshop will comprise:

- An Update on @TCO/ITCO Combined Organisation
- Explanation of the Depot Audit Process
- Chemical company requirements from depots
- Gaskets and valves issues

Participation is free of charge for accredited @TCO Depots, and ITCO Members who have registered for the afternoon Regional Meeting.

There is a RMB 200 fee for other depots and members.

To register for the Workshop, please email: hicks@itco.org

3. ITCO Tank Container to Shanghai Maritime University

After a year of planning, ITCO will be delivering a fully operational tank container to Shanghai Maritime University (SMU) on Thursday 28 November. The aim of the donation is to provide a benefit to the SMU's logistic students.

ITCO will be providing the University with 6 one-day training courses, together with training materials from the ITCO E-learning Course.



4. Book your stand at Tank Container Village at *Transport Logistic China 2020*

ITCO will be organising the next **Tank Container Village** at *transport logistic China 2020*, taking place in Shanghai from Tuesday 16 June to Thursday 18 June 2020.

Members of ITCO are invited to apply for an Exhibition Stand in the Village. To download the Information Pack and Booking form, click here: [ITCO VILLAGE](#)

Further information about transport logistic China 2020 can be found on this link: <http://www.transportlogistic-china.com/>

5. Report of ITCO 2019 Members Meeting in Amsterdam M

The 2019 ITCO Members meeting was well attended, with a wide range of issues relevant to members discussed during the conference. Members are encouraged to review the full Conference Report that was prepared. It is available to download from the website.

6. ITCO Environment WG – two initiatives

The Environment Work Group at the Amsterdam Meeting focused on Environmental issues, specifically relating to the use of single-use plastics.

Two initiatives came out of the WG meeting

(i) Letter from the president to the Alliance to End Plastic Waste...

One of the initiatives was to contact the newly formed "[Alliance to End Plastic Waste](#)", which has been established in Singapore. ITCO President Reg Lee has written the following message to the Organisation:

"ITCO fully supports the aims and objectives of AEPW and in our own small way we have been helping the chemical industry become more aware of the environmental problems associated with shipping non-hazardous chemicals in single trip plastic bags in 20ft box containers on international trade routes,

Our issue as an environmentally focused organization is not on the absolute use of the bag but that we know the bags are not reused and most commonly end on landfill.

It is currently estimated almost one million shipment will be made in these bulk plastic bags with the majority, after being discharged but unclean, being sent to land fill sites around the world

The safer alternative is the 20' ISO stainless steel tank container, which has a life expectancy of 20 years plus with 90% of the tank material recyclable at the end of its useful life

Additionally as a bulk liquid focused organization we often get lumped in the bags safety issues so this is important a consideration for us to improve the whole bulk liquid transportation supply chain.

ITCO and its members are happy to supply any additional information, examples and photos of incidents can be provided if needed to assist in any study that your organization may take."

(ii)and development of an Animated Video

The second initiative was the development of an Animated Video, showing the issues relating to single-use plastic and the benefit of tank containers.

The Board has approved the production of this video and initial preparations are under way.

7. ITCO Efficiency Work Group

During the Amsterdam meeting in October, ITCO launched a Tank Container Telematics/Data Standardisation initiative - which includes all relevant stakeholders.

Participants attending the WG agreed to run two activities in parallel (under the same Work Group umbrella) in order to proceed efficiently towards a mutual understanding of WG goals and needs.

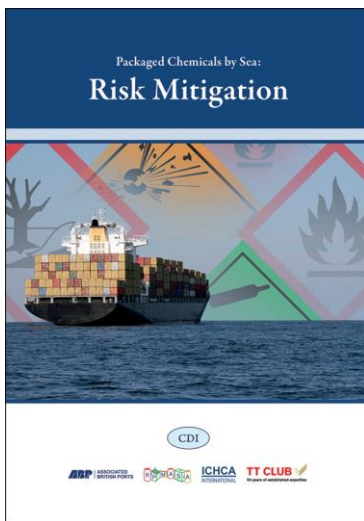
Detailed information can be found in the Technical Report, later in this newsletter.

8. New CDI Publication: "*Packaged Chemicals by Sea: Risk Mitigation*"

"Packaged Chemicals by Sea: Risk Mitigation" is the latest publication from the Chemical Distribution Institute. This CDI book provides insight into the entire, marine logistic distribution supply chain and the responsibilities of chemical manufacturers and their service providers.

Drawing on the vast, wide knowledge and experience of all stakeholders and participants in the CDI global "International Marine Packed Cargo Audit Scheme" (IMPCAS), the book introduces the industry partners and their relationships within the supply chain.

"Packaged Chemicals by Sea: Risk Mitigation" is available to purchase from CDI's publishers "Witherby Publishing Group" in both hard back and E-Book versions for £125, from the following link: <https://www.witherbyseamanship.com/cdi-packaged-chemicals-by-sea-risk-mitigation.html>



9. ITCO Tank Container E-Learning – Two Free Courses for Each Member

As announced in previous newsletters, ITCO Members are offered to TWO FREE E-LEARNING COURSES each.

Companies who have not yet taken up this offer, but who wish to benefit from it, should contact the Course manager, Exis Technologies – contact: Melanie.Stephenson@existec.com

10. ITCO Membership Criteria: Reminder of application process

ITCO Membership is open to companies which are actively involved in the tank container business, and who meet the criteria for the relevant division that they wish to join. To download the criteria, click on this link: [MEMBERSHIP CRITERIA](#)

They must sign a declaration confirming that they will meet the aims of the Organisation. Download the declaration letter [HERE](#)

Applications are reviewed by the ITCO Board at the next available Board Meeting. The ITCO Board has the final discretion on accepting any new proposed member.

11. ITCO on Twitter

ITCO now has an active Twitter account. In addition to the more “traditional” method of communicating to Members by email, we will also tweet out relevant news and announcements.

Members are warmly to follow ITCO on Twitter, click here: [TWITTER](#)

For further information on items in this newsletter, please contact hicks@itco.org

B. ITCO November 2019 Technical Report

This month:

- IMO CSC
- IMO Dual Specification UN Portable Tanks
- RID-ADR Tank operator definition amendment
- Periodic-Inspection and Test
- ITCO Telematics Tank WG

- **UN FRP WG**
- **ACC Self-adhesive cladding patches**
- **Regulation compliance 2020**
- **Quiz question**

1. IMO CSC Stacking Mass

CSC requires containers and tank containers to be designed to a stacking mass of 192,000kg. Containers below this stacking mass should be specially marked as “limited stacking” according to ISO 6436. Swap tanks displaying a CSC safety approval plate and perhaps some very old tanks, might fall into this limited stacking category

At the 09.2019 meeting a proposal was made to increase the stacking mass to a minimum figure of 213,000 kg as stipulated in ISO 1496. This proposal was referred to the editorial and technical committee.

A review of production statistics indicates that the majority of containers are constructed with a stacking strength at or above the 213,000 kg figure stipulated in ISO 1496.

As a provision, in the event that the increased minimum stacking is eventually approved, ITCO members are advised to consider any new purchased tanks are specified at 213,000kg or above. Otherwise, no immediate action is required.

2. IMO Dual Specification UN Portable Tanks

At the 09.2019 IMO meeting the Russian delegates proposed that UN Portable Tanks should not be allowed to be dual approved RID-ADR 6.8

Regrettably, the proposal was partly agreed and referred to the Editorial and Technical Group for further consideration.

Disallowing dual specification tanks is disadvantageous to industry. Companies that construct tanks with dual specification, do so at additional cost for sound operational reasons, not least to allow RID-ADR 6.8 tanks to be transported at sea, including short-sea transports.

On a wider consideration it creates a precedent for curtailing other dual specifications e.g. IMO4 and on that basis potentially US DOT 51, US CFR 49 and various other National regulations

To contest the proposal representation needs to be made to the administrations of each country attending the IMO meeting in April 2020 setting out the ITCO case. A document is being prepared.

Members that are concerned with this restriction on tank container use, should contact the technical secretary.

3. Periodic Inspection and test RID-ADR Inspection Work Group

The machinations of the WG continues its seemingly ever widening scope. The WG is focused on road-tank vehicles but includes tank containers and extends to ADR 6.7 UN portable tanks.

The proposed accreditation processes to be imposed on AIB's (authorised inspection bodies) is expected to impact on the tank container industry because the new restricted procedures have an effect on operational flexibility and costs. For example, here is an extract from the ADR meeting report of the proposal provisions:

(a) Entry into service verification: A note was added to accommodate, for example, TPED by indicating that mutual recognition agreements should be taken into consideration when deciding on the application of the entry into service verification.

(b) The use of a single inspection body: It was decided that the placing of a provision that a single inspection body should be used for inspection, to prevent so called "tank tourism", would be more appropriately referenced in 6.2 and 6.8 than in 1.8.7.

This effectively means that a) AIB's accredited in one country would not be free to offer services in another country without obtaining either accreditation or a joint arrangement. TPED (Transportable Pressure Equipment Directive) was intended to allow free movement within Europe.

In (b) this indicates that tanks registered in one country should not be tested in another.

These proposals might be workable for road vehicles but they would be difficult for the tank container industry.

Whereas the proposals concerning RID-ADR 6.8, means the risk is, that the procedures will affect UN Portable Tanks too.

ITCO is creating a position paper on the proposals to facilitate members to contact their respective country administrations and make views known

4. RID-ADR Tank operator definition amendment

A proposal submitted to the September 2019 RID-ADR Transport DG, Geneva meeting was agreed and passed to the editorial committee for inclusion in RID-ADR 2021. Readers of this newsletter will recall that three papers have been submitted to the Joint Committee on the subject.

This addresses the requirement to re-define the registered owner of a tank container to ensure that the financial owner (bank or lessor) is not defined within the regulations as the tank operator and thereby subject to safety obligations beyond their control.

The meeting agreed the following amendment which will be included in the 2021 edition of RID-ADR-ADN

ADR/ADN:) 1.2.1 Replace the definition for "*Tank-container/portable tank operator*" by:

"*Tank-container or portable tank operator*" means any enterprise in whose name the tank-container or portable tank is operated;"

(Reference document: ECE/TRANS/WP.15/AC.1/2019/30, as amended)

(RID:) 1.2.1 Replace the definition for "*Operator of a tank-container, portable tank or tank-wagon*" by the following two definitions, in proper order:

"*Tank-container or portable tank operator*" means any enterprise in whose name the tank-container or portable tank is operated.

"*Operator of a tank-wagon*"⁵ means any enterprise in whose name the tank-wagon is registered or approved for transport."

(Reference document: ECE/TRANS/WP.15/AC.1/2019/30, as amended)

(RID:) 1.2.1 In the definition of "Tank-wagon", replace "shells" by "tanks".

5. ITCO IT/Telematics Data Standards Work Group

- During the Amsterdam meeting in October, ITCO launched a **Tank Container Telematics/Data Standardisation** initiative - which includes all relevant stakeholders.
- Participants attending the WG agreed to run two activities in parallel (under the same Work Group umbrella) in order to proceed efficiently towards a mutual understanding of WG goals and needs.
- The Group of “owners” (i.e. lessors and operators) will work on defining “pain points” and potential use cases for IoT applications
- It was agreed that they will work to a deadline of 15 December 2019, when they will give their feedback to me.
- The “**vendors**” attending the meeting agreed to review the **ITSS Standard** and inform the Group if they feel it is applicable for the tank container industry. **The deadline to respond was also agreed as 15 December**
- The relevant information about ITSS can be found on this link to TIS (<https://tis.ag/en/>). And the ITSS v.1 rail standard can be found on this link <https://tis.ag/en/download/itss-standard-specification-interface-1-version-1-2-final-2018-09-new/?wpdmdl=607&refresh=5db98aafac9911572440751>

Thank you in advance for your collaboration on this project – and for your feedback to the secretary before the deadline. Additional members are invited to join the WG - contact the secretary (hicks@itco.org)

6. ACC - Self-adhesive cladding patches

During the ITCO Amsterdam technical meeting it was proposed to evaluate increasing use of SACP's in place of rivetted patches and, if appropriate, include in ACC. Although SACP's have been found to work well there are issues to formalise in regard to dimensions, damage over-lap and TIR approval.

Members who are interested in assisting to develop ACC acceptance should contact the Technical Secretary (rubery@itco.org)

7. Regulations – Compliant 2020

- UN ADR / RID 19 – mandatory from 07.2019
- IMDG 39-18 – Mandatory 01.01/2020

An internet search will show that copies of regulations are available from various sources in hard copy or electronic form.

Companies such as Labeline supply globally DG regulations including IMDG, ADR, RID, CFR49 and other DG requirements <https://www.labeline.com/about/>

Exis Technologies, who provide the ITCO e-learning course, provide an on-line version of IMDG Code, along with other formats, available from <https://existec.com/solutions.aspx>

ADR is available for free download from the UNECE web site in PDF format <http://www.unece.org/trans/danger/publi/adr/adr2019/19contentse.html>

RID is available for free download from OTIF web-site https://otif.org/en/?page_id=1105

8. Quiz question

Which, if any, of the following is incorrect?

- a. ADR 6.7 is a UN Portable Tank and enables the tank to be used on land within Europe
- b. ADR 6.8 is a tank container and enables the tank to be used on land within Europe
- c. ADR 6.8 tank codes e.g. LB4N should not be marked on an ADR 6.7 UN Portable Tank

Answers, email to the technical secretary (rubery@itco.org)

For further information on any of the points raised in this Report, Members should contact the Technical Secretary or the North American Technical/Regulatory Consultant:

ITCO Technical Secretary:
Colin Rubery: rubery@itco.org

N. American Technical/Regulatory Consultant:
Jim Silver: jsilver@silvercims.com