RID: 11th Meeting of the working group on tank and vehicle technology
(Berne, 18 and 19 May 2010)

Subject: ITEM 3 – Drip leaks

Information transmitted by Germany

1. At the last meeting of the working group on tank and vehicle technology (Brussels, 11 and 12 June 2009), Germany summarised progress on this issue in informal document INF.1 (see also paragraph 11 of report OTIF/RID/CE/GT/2009-A). At the meeting, Germany announced that at the next meeting, it would submit a report on the assessment of both parts of the research project that the German Petroleum Industry Association had been commissioned to carry out.

2. In the meantime however, UIC brought this subject up at the Joint Meeting (Berne, 22 – 25 March 2010) (see also document OTIF/RID/RC/2010/5 – ECE/TRANS/WP.15/AC.1/2010/5). In addition to this document from UIC, the Joint Meeting also had the following informal documents: INF.8 from Germany and INF.16 and INF.35 from CEFIC. These documents were dealt with in the tank working group (see also paragraph 3 of the report of the tank working group (informal document INF.42)).

3. Various possible solutions were discussed in the tank working group, including the introduction of instructions for filling and discharge facilities. These instructions were also proposed by CEFIC and according to the report, were supported by the tank working group.

4. The tank working group also established that the engineering design of road and rail vehicles differed, so there might be different solutions for each mode. For this reason, further discussions to find a definitive solution to the problem of drip leaks might be necessary.
5. However, the result of the discussion was that the tank working group proposed alternative wording for 4.3.2.3.3 as a solution for the time being. Unfortunately, this was adopted by the Joint Meeting.

6. At the Joint Meeting, Germany pointed out that this amendment to the wording of 4.3.2.3.3 was not a permanent solution to the problem of drip leaks – quite the opposite: for example, even with the new wording, it was still not clear how the filler can ensure that there is no leakage after filling has taken place. The consequences for new participants (unloader from 2011, see also new 1.4.3.7.1) were not investigated further and were not taken into account.

7. From Germany’s point of view, it is particularly regrettable that the approaches originally considered, which were good and purposeful (e.g. introducing instructions for filling and discharge facilities) were not looked at further in the tank working group.

8. The Joint Meeting’s decision gave rise to a number of discussions. Paragraph 8 of report OTIF/RID/CE/GT/2009-A – ECE/TRANS/WP.15/AC.1/118 already points out that some delegations said they wanted to return to this issue.

9. Germany is prepared to support those who wish to continue to work on this issue, but as a result of the discussion at the Joint Meeting and the decision to amend the regulations, which was adopted by a large majority, considers that it is prevented from pursuing its own solutions to the problem with any degree of success.