



ITCO 2019 Members Meeting

Amsterdam - 30 September & 1 October 2019

Meeting Report

- **Panel Session: Safe Transport of Chemicals**
- **Plenary Session Presentations**
- **Minutes of the Divisional Meetings**
- **Minutes of the Work Group Meetings**

A total of 145 delegates attended the 2019 ITCO Members Meeting, held in Amsterdam on Monday 30 September and Tuesday 1 October 2019.



The Meeting featured Panel Discussions, Plenary Presentations, Divisional Meetings and Work Group Sessions.

All participants were requested to keep to the ITCO Anti-Trust Compliance Guidelines throughout the Meeting.

A Report of the Meeting is published below.

A. Panel Session: Safe Transport of Chemicals

The panel session, moderated by Peter Mackay, Editorial Director, Hazardous Cargo Bulletin, took place on Monday 30 September.

There were two keynote presentations - followed by a panel discussion:

- **Lessons learned from the *MSC Flaminia* decision** – presented by *Peregrine Storrs-Fox*, Risk Management Director, TT Club



- **Transportation Stewardship** – presented by *Maayke Van Noort, Global Senior ES&S Mode Leader, Marine Bulk and Terminals, Dow Chemical*



MSC Flamina

The presentation highlighted the tragic explosion/ fire in 2012 that involved a polymerising substance transported in a tank container. The accident report found a number of indicators where better communication might have resulted in a different outcome.

Key contribution factors

- Shipment decision making
- Stowage

Safety obligations

- Shipper
- Operators duty of care
- Review control measures

SP386 (see IMDG Dangerous Goods List column 6) includes a requirement for information that is required to ensure safe transport of polymerising substances.

Transportation Stewardship

The presentation explained the procedures in place at Dow Chemical that are designed to ensure efficiency and safety throughout the logistics value chain.

- Effective safe & secure
- Efficient
- Good communication
- Risk management

- Fewer disturbances

Panel discussion

The following participated in the panel discussion:

- Maayke Van Noort, Global Senior ES&S Mode Leader, Dow Chemical
- Martin Levitt, Technical Director, Den Hartogh Global Logistics
- James Rawlinson, Group Technical Services Manager, M&S Logistics
- Peregrine Storrs-Fox, Risk Management Director, TT Club
- Colin Rubery, Technical Secretary, ITCO



The panel discussed these subjects:

Polymerising substances

SP386 refers to the “person offering the tank”. The panel discussed the obligation of the shipper who is offering the tank but also recognised the duty of care of the operator with regard to the information required by SP386.

Communication between all relevant parties is an essential element of safe transport. The tank operator should fully inform the shipping line when making logistics bookings.

SDS

The panel noted that the SDS is focused on safety of persons and that transport data limited (Part 14) to the regulatory requirement.

Classification accuracy is variable and examples were given of substances where differing transport information is recorded.

The panel suggested that operators, through training and experience, should evaluate the SDS and be aware that important transport relevant may be found in other sections in addition to section 14

Mis-declaration of cargo, being a significant problem in containerised transport, was not considered to be an issue in tank containers.

4PLs

Panel discussed the effect of 4PL’s on the logistics communication chain.

Potential risk from added links to the information chain requiring 4pls to be properly vetted and managed by the shipper

Essential information, in addition to that governed by regulation remains necessary

Tank operators need an awareness of appropriate information required and as part of their duty of care seek any missing information

EDI - electronic data exchange

The panel discussed whether transmission by EDI results in a loss of important information. Information is governed by regulation and EDI should not reduce essential requirements.

Outcome

In their concluding discussion, the panel agreed that “Safe Transport” requires:

- Quality management
- Training
- Recruitment
- Communication

B. Plenary Presentations – Focus on Safety

Following the Panel Discussion on the afternoon before, there were five presentations during the Plenary Sessions on Tuesday 1 October.



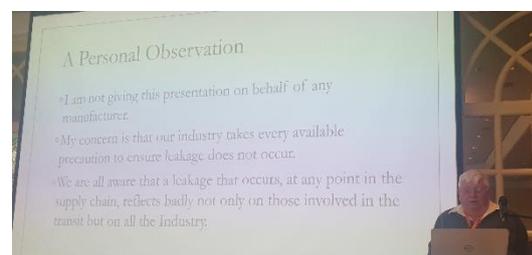
The morning began with **Peter Mackay**, Editorial Director of Hazardous Cargo Bulletin, giving a perspective of how we should learn from accidents in the past, under the topic of: “What’s the worst that can happen?”

Capt. Howard N. Snaith, General Manager, CDI - Chemical Distribution Institute, updated delegates on the work that the CDI is doing in relation to inspection and audit procedures, to improve safety for chemical transport and storage.



“Working at Height” is relevant for all sectors of the tank industry. **Evert de Jong**, Responsible Care Director, European Chemical Transport Association, reported on the work that ECTA is doing.

Leaks from tank containers is an important issue for the industry. In his presentation, “Leaking - an issue that affects us all”, **Graham Wood**, Director, Davlis ISO Containers, reviewed the issues.



Finally, **Reg Lee**, President of ITCO, updated delegates on the project to present a tank container to the Shanghai Maritime University. He showed delegates pictures of the tank container and confirmed that the University would also be provided with 6 one-day training courses, together with training materials from the ITCO E-learning Course.



Event Sponsor

In concluding the Conference, Reg Lee took the opportunity to thank M&S Logistics for sponsoring the Welcome Reception on Monday 30 September and the Cocktail Reception and Buffet Dinner on 1 October 2019

PDFs of Presentations

PDFs of the presentations are available for Members to download from the ITCO website.

C. Minutes of Divisional Meetings

ITCO's four Divisions held their 2019 Annual Meetings in Amsterdam on Tuesday 1 October 2019. The Minutes of the Meetings are as follows:

Operators Division Meeting

Lessors Division Meeting

The Operators and Lessors Divisions held their meeting jointly.

Moderators: Jürgen Schlötelburg, Hoyer Group; and Chris Trett, Stolt Tank Containers

- ITCO's Anti-trust compliance guidelines for Meetings were confirmed
- The following items were discussed and agreed:

1. ITCO / @TCO certified cleaning stations

- The list of ITCO/@TCO certified cleaning stations is on the ITCO website
- Some participants indicated that they would like to see an audit report in detail.
- A blank audit form may be available to members, on request

2. Digitalization

- This issue of Digitalization in the tank container industry had been raised by VTG in advance of the meeting
- It was agreed that the matter should be done in conjunction with the “Efficiency” Working Group.
- It was recommended that 3 or 4 ITCO members should be involved in this working group and agree the correct way forward. VTG would participate in the WG.

3. Members’ “expectations”

- After a lengthy discussion, it was considered if:
 - ITCO needs a commercial director, who can strengthen the networking with other associations - of our customers and our key suppliers (ship and rail).
 - This work group believed that it was only possible if done on a full time basis and as a paid position.
 - Within the organisations which develop regulations, this is already being done very successfully by Colin Rubery.
- Laurie Maclachlan and Jürgen Schlötelburg have undertaken to prepare a CV/job-description and a cost statement which should be presented to the Board for their consideration.
- It was recognised that this investment cannot be made without increasing contributions from Members to ITCO.
- If approved by the Board, a survey of all member companies should be done on the willingness to finance and the additional increase in membership fees that this would incur.

4. Video

- A proposal for a video was on the agenda.
- Due to time constraints, this matter was not discussed in this Meeting, but was allocated to the ITCO “Environment” Work Group, meeting later in the afternoon.

5. Carbon footprint study

- A proposal for a study into the Carbon Footprint of tank containers had been received in advance of the Meeting
- However, due to time constraints, this matter was not discussed in this Meeting, but was allocated to the ITCO Environment Working Group.

TSP Division Meeting

Moderator: Gunther Van Loon, Group Van Loon

- ITCO’s Anti-trust compliance guidelines for Meetings were confirmed
- The following items were discussed and agreed:

1. Working at height

- The TSP Division asks for commitment from the other divisions (and the ITCO organization) to promote and actively support safe working by TSP’s on their sites and on third party’s sites.

- (a) **Proposal to the Board:** create a safe working charter that should be signed by as much leasing companies, operators and TSP's as possible (with a 'stop the work' clause);
 - (b) **Proposal to the Board:** make a common statement with ECTA towards the customer base to enforce customer base's responsibilities to avoid working on height by drivers or provide safe entrance by gantries.
- Discourage the use of fall harnesses
 - **Advice to the board:** totally ban the use of "portable handrails" from the tank container industry.
 - **Advice to operators and leasing divisions:** use "safe working at height" as a minimum selection criterion for all depots globally.

2. Risk management & insurances

- TSP's request the Board to set up a work group to analyse possible gaps in liability rules between regions and establish possible gaps between risk coverage by tank owners and depot holders.
- The goal should be to find third parties willing to offer an insurance policy to depots worldwide to insure the risks put upon them.
- The complete industry would benefit from transparency in risk management between all parties and a 'standard' all-risk coverage for tanks standing in depots seen increasing risks of 'act of God' cases that are not always covered by conventional insurance policies.
- We have noted interest from the TT club and from Pound Gates to cooperate.

Manufacturers Division Meeting

Moderators: Jee, CIMC and Graham Blanchard, Fort Vale

- ITCO's Anti-trust compliance guidelines for Meetings were confirmed
- The following items were discussed and agreed

1. **Communication from ITCO with regards to implemented regulation changes, proposed regulation changes and to have a more active involvement in influencing decisions with various international bodies**

- Discussion was had around ITCO having a more pro-active involvement in disseminating information to relevant parties with regulatory changes.
- A suggestion was made to set up an email alert to share with members when changes were made.
- Further discussion concluded with the general feeling that the technical teams within the individual organisations should be aware of the relevant changes related to the products they produce and markets/industries they serve.
- It was felt that Colin Rubery couldn't deal with every single change or proposed change, as this task would be far too difficult for one person to achieve.
- It was highlighted that ITCO produce a monthly newsletter with a technical bulletin, but members need to be subscribed to this service in order to receive it via email.
- Otherwise the newsletters and technical bulletins are available on the ITCO website.

2. **Seals & Gaskets**

- The OEM valve manufacturers all raised a concern of seals and gaskets coming on to the market claiming to be suitable for fitting into the OEM manufacturers' equipment.
- A number of points were made including the risk to operators and leasing companies having void warranties through not using OEM supplied spares and also void approvals where the OEM valve manufacturers carry out rigorous testing at low and high temperatures along

with specified cycle testing as part of the Type approval process to gain approvals to BS EN 14432 & BS EN 14433. Using non-OEM manufactured components in the valve sealing systems will mean that the valve is no longer approved in these situations.

- The OEM valve manufacturers contribute to the safety requirements of the industry and help promote the tank container as one of the safest modes of bulk chemical transportation. Through extensive investment in R&D and continuous improvements the valve manufacturers gain third party approvals to ensure the performance and reliability of their equipment.
- It was the valve manufacturers' wish - through this divisional meeting - to raise awareness with the operators and leasing companies as to the risks of using non-approved equipment, potentially leading to the loss of dangerous or expensive cargoes and the associated damage to reputation through not policing what type of equipment was being installed in their depots.

3. ITCO 2020 Members Meeting proposal

- Board Members had been requested to ask the divisional members about a proposed change of location for the 2020 members meeting.
- Eastern Europe and Russia were suggested to try and include the emerging markets in these areas and to try and attract new members and raise awareness of ITCO.
- The general feeling from the manufacturers division was that, unless there was going to be a significant push/promotion of ITCO in these areas where the response would be worthwhile from these emerging countries, then a central European location such as Amsterdam is easier for members to arrange travel to and from.

4. Smart Tanks and Telematics

- The topic of "Smart Tanks" and "Telematics" was briefly discussed
- The main points raised were that it didn't appear that there was a strong enough understanding of what information wanted to be collected, what the appropriate technology should be and what kind of benefit the end user would be receiving in terms of the additional price they would have to pay for the privilege of this new technology.
- The view of the manufacturers was that currently - and especially in this financially uncertain climate - smart tanks were cost prohibitive.

5. FRP Tanks

- The point was raised that FRP tanks are currently going through various regulatory assessments.
- The manufacturers felt very strongly that ITCO should be actively involved with the regulators, to ensure that the proven record of the stainless steel constructed tank containers should be considered.
- ITCO should use its influence to ensure that the safety aspects of proven stainless tanks is replicated within the regulations for FRP tanks, particularly with reference to materials of construction and testing requirements.

D. Work Group Meeting Reports

There were four Work Group Break-out Sessions, focusing on the main issues that ITCO is addressing:

- ***Efficiency***
- ***Environmental***
- ***Safety***
- ***Technical***

WG A: “Efficiency”

Moderator: Patrick Hicks

- The Moderator began by a giving general introduction to the WG and by requesting that all participants adhered to the ITCO Anti-Trust Compliance Guidelines for Meetings.
- He explained that under the title “Efficiency”, the Group would be looking specifically at Telematics and Track & Trace issues for Tank Containers.
- Some participants referred to the Operators Divisional Meeting which had taken place previously in the afternoon, and it was agreed that the Group should also include the subject of “Digitalization” within its remit.
- The moderator said that the overall agenda would comprise the following issues, which the Group would be asked to decide on:
 - Beneficial Cargo Owner (BCO) “pain” points
 - Standardisation initiatives: work on user cases, technology and UI standards – collaboration needed?
- After a wide-ranging discussion amongst participants, the following action-plan was agreed:
 1. A Work Group will be formed, comprising all relevant stakeholders (who must in any case be a member of ITCO).
 2. The **Asset Owners (Operators and Leasing Companies)** will communicate with each other and develop a clear remit of what they require from the Work Group.
 3. The **Systems Suppliers (Vendors)** will review the existing Standards that have been developed by the Rail industry, and identify to what extent they can be used for the tank container industry.
- The deadline for receipt of this feedback was agreed as 15 December 2019.

WG B: “Environmental”

Moderator: Laurie Maclaughlin

- The Moderator requested that all participants adhered to the ITCO Anti-Trust Compliance Guidelines for Meetings
- He confirmed that this Work Group would focus on the environmental issues with the disposal of empty used plastic bags.
- He explained the background to this issue:
 - In 1953, high density Polyethylene was created and cheap plastic bags arrived on the scene.
 - At the time in the United States, most grocery stores were using paper bags, but 1000 paper bags cost on average \$30 and Plastic Bags cost \$24 per 1000.
 - In the 60’s plastic really took off and was deemed one of the inventions of the century.
 - By the end of 1985, 75% of supermarkets in the US used Plastic bags rather than Paper bags.

- Today waste plastic and in particular single-use plastic grocery bags are looked upon as **THE** global scourge of our lands and oceans.
- Most of the world's nations have either banned the use of Single use plastic bags or have introduced taxes on their use.
- Now even the United States is considering national legislation
- California and other states have already taking their own independent action.



Where are plastic bags banned or taxed around the world?

State	Legislation Type	State	Legislation Type
Bangladesh	Ban	Colombia	Tax
Benin	Ban	Czechia	Tax
Bhutan	Ban	Denmark	Tax
Burundi	Ban	Estonia	Tax
Cameroon	Ban	Greece	Tax
China	Ban	Ireland	Tax
Cote d' Ivoire	Ban	Mozambique	Tax
Eritrea	Ban	Netherlands	Tax
France	Ban	Poland	Tax
French Guyana	Ban	Portugal	Tax
Gabon	Ban	Romania	Tax
India	Ban	Slovakia	Tax
Italy	Ban	South Africa	Tax
Kenya	Ban	Sweden	Tax
Macadonia	Ban	Turkey	Tax
Madagascar	Ban	United Kingdom	Tax
Malawi	Ban	Argentina	Partial ban or tax
Mali	Ban	Bolivia	Partial ban or tax
Mauritania	Ban	Brazil	Partial ban or tax
Moldova	Ban	Burma	Partial ban or tax
Morocco	Ban	Chad	Partial ban or tax
Myanmar	Ban	Chile	Partial ban or tax
Nepal	Ban	Ethiopia	Partial ban or tax
Papua New Guinea	Ban	Greenland	Partial ban or tax
Republic of the Congo	Ban	Indonesia	Partial ban or tax
Rwanda	Ban	Japan	Partial ban or tax
Senegal	Ban	Malaysia	Partial ban or tax
Sri Lanka	Ban	Mexico	Partial ban or tax
Taiwan	Ban	Netherlands	Partial ban or tax
Tanzania	Ban	Pakistan	Partial ban or tax
Tunisia	Ban	Philippines	Partial ban or tax
Uganda	Ban	Somolia	Partial ban or tax
Botswana	Tax	Spain	Partial ban or tax
Bulgaria	Tax		

Data assembled by ReuseThisBag.com



Problems with flexibags

- A flexibag is a big single use plastic bag, it weighs approximately 40 kilos.
- A supermarket bag weighs approximately 5.5grams. So a flexitank is the equivalent of 7272 plastic single use grocery bags.
- What is the ecological value of a family taking their reusable bag to the supermarket if the liquid product they are buying was shipped using a flexibag?
- In this digital, social media dominated age we cannot afford to be subtle about the damage caused by single use plastic.
- At its most conservative a stainless steel ISO tank does 4 trips per year over a 15-20 year lifespan - that is 60-80 trips, which is therefore equivalent to half a million plastic bags or more.
- There are no reliable statistics or proof of the percentage of Flexibags that are re-cycled effectively. There are claims but no substantiation. We must therefore assume that a significant number of bags are finding their way to landfill and eventually our oceans.
-
- 8m pieces of plastic go into our Oceans every day. It has to stop.



- What do we do about it? We can do our bit by promoting Stainless Steel reusable Tanks over Plastic bags.
- The working group recommend that we make available a budget to create a short animated video to tell this story and for it to be put out on social media to inform, and at the same time promote the Tank Container as the sustainable alternative to a product which has long term implications for our environment.

WG C: "Safety"

Moderator: Gunther Van Loon

- The Moderator requested that all participants adhered to the ITCO Anti-Trust Compliance Guidelines for Meetings.

- He confirmed that the Group would be focusing on two key issues: Working on Height and Seals
- The Group agreed that the reputation of the industry is at stake; and that it is our common responsibility to make sure that
 - (a) working on height is safe; and that
 - (b) tank leakages because of faulty/fake gaskets must be reduced to an absolute minimum.

Working on Height

The advice from the Safety Work Group was as follows:

- ITCO should put together an industry charter
- ITCO should work out a common charter with ECTA that can be used by the individual parties throughout the supply chain to insist on safe working at height at customers' sites.

Seals

The Group agreed that this is a very difficult subject, with many different opinions being discussed. One possible way forward might be as follows:

- Definition or "normation" of the gaskets that can be used (eg material, size, resistance, etc).
- Certification of gasket suppliers as 'approved supplier' after successfully having passed a (paid?) ITCO audit based on production quality, process and quality assurance, track record, gasket testing and/or other items.
- Promote low pressure leak test on each tank before each trip - and ban vacuum tests from the industry as being a bad practice.

WG D: Technical

Moderator: Colin Rubery, Technical Secretary

- The Work Group was attended by 39 Members. The Moderator requested that all participants adhered to the ITCO Anti-Trust Compliance Guidelines for Meetings.
- The WG discussed the latest developments with regard to:
 - Regulatory meeting attendance and procedures
 - UN Dangerous Goods
 - IMDG
 - RID-ADR
 - ISO /CEN
 - INDA
 - ACC – Cladding
 - Communication

WG Outcomes

- **ITCO technical representation** at regulatory bodies is to continue.
- **Coordinated action:** The importance of members contacting their respective country authorities with a coordinated ITCO response was highlighted.

- **UN FRP tanks:** ITCO is present on the WG. The current status of the development of a design and construction chapter highlighted. Overall, the development is proceeding to plan. The next session will include the various material tests to be implemented.
- **IMDG proposal concerning CSC minimum stacking** requirement 192,000kg and ISO 1496-3 requirement of minimum 213000kg. Members indicated that new production tanks are constructed to 213,000kg
- **Inspection procedure amendments** expected to result from the current RID-ADR review are likely to be detrimental to the tank container industry. ITCO is to prepare a response highlighting the issues with a view to coordinated actions by members.
- **RID-ADR agreement to an amended definition of a tank operator** / registered owner is helpful to lease companies especially
- **RID-ADR 6.8 dual specification** tank potential restrictions were discussed. ITCO is to prepare a response highlighting the issues with a view to coordinated actions by members.
- **ACC cladding** – ITCO will prepare a proposal for the WG to consider an amendment to ACC acceptable condition that if adopted would allow for the use of self-adhesive cladding patches.
- **The monthly technical newsletter** distribution will be promoted.

***Report by ITCO Secretariat
October 2019***