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TO:

HID CI1-5 (Band 0-4) and Regulatory Compliance Officers (RCOs)
All FOD Inspectors and Health and Safety Awareness Officers

THE PREVENTION OF FALLS FROM ISO TANK CONTAINERS

Purpose

1. This SLC gives information about guidance (called a protocol) published by the International Tank Container Organisation (ITCO) aimed at minimising the risks associated with working at height on the top of ISO tank containers. The protocol can be accessed via the ITCO website: www.itco.be

2. ITCO is the main industry body that represents the manufacturers of tank containers, leasers, operators, and tank services providers i.e. inspection and maintenance depots. The Organisation comprises some 80 companies, many of who operate globally in the transportation of goods by tank container.

The Protocol

3. The protocol was drafted in consultation with HSE. It provides guidance to ITCO members and those parties involved in the tank container supply chain, on minimising the risks associated with working at height.

4. Its objectives are to ensure:

a) A consistent approach to tank container safety;

b) Industry understands what the standards are and the basis for them;

and

c) The roles and responsibilities of parties involved in the supply chain i.e. consignors, loading points, rail and shipping terminals, repair / storage depots, receiving customers, and tank container operators are understood.

5. The protocol, whilst setting out to eliminate access by design acknowledges that this is a long-term solution and for the interim period to 2013, it sets out the measures that should be taken, along with a timetable for doing so.

6. The protocol recognises that the need to access the top of tank containers cannot always be eliminated and that people working on top of tank containers need additional levels of protection.

7. The range of designs of tank container is considerable, and incorporates differing configurations of framework, ladders and walkways; tank sizes also vary within the framework. These design issues coupled with the road, rail and sea journeys that a tank container could take [multimodal], along with the transport requirements for each, means that the provision of collapsible handrails on tank containers to enable safe access to the top is not reasonably practicable. Instead, other means of safe access may be required; this contrasts the situation with road tankers. Consequently, the protocol places a greater emphasis on the on-site provision of safe access arrangements where access on to the tank container is required.

ACTION BY INSPECTORS

Inspectors are asked to note the existence of this protocol.

'Preventing falls' remains an HSE priority, including the prevention of falls from vehicles, as part of the Workplace Transport and Falls from Height Injury Reduction Programmes.

Where inspectors undertake inspections at premises where tank containers operate, inspectors should make enquiries to ensure that:

- safe delivery plan exists (link to HSE website on Workplace Transport; and

- effective arrangements are in place to prevent falls where access onto tank containers is required.

Cancellation date

This document should be destroyed 6 months from the date of issue.

Further Information

Contact Clive Dennis, HID Chemical Industries Strategy Unit (CI4).

Annex 1

Tank containers

1. A tank container is a type of freight container, which includes two basic elements, the tank or tanks, and the framework. A typical tank container shown mounted on a trailer is illustrated beneath.

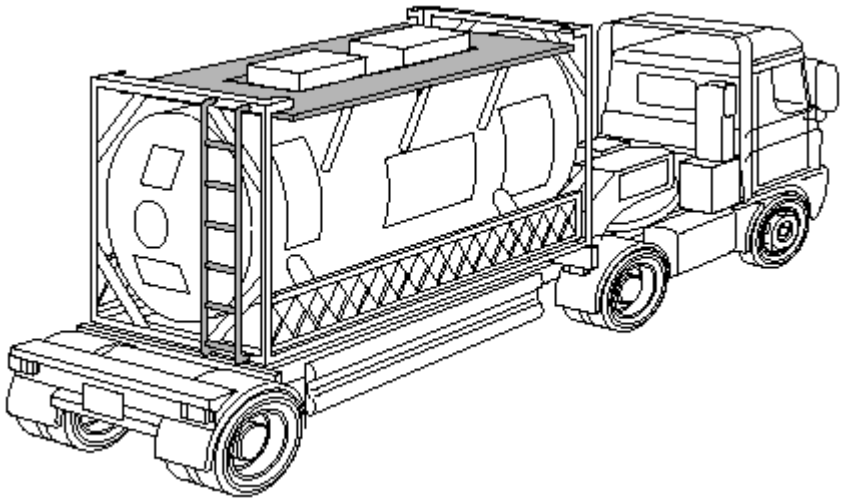

Figure 1. A typical tank container-trailer unit for road transportation

2. Tank containers are used primarily for the international transportation of goods including gases, liquids and pressurised dry bulk goods, as well as some foodstuffs. They are specifically designed to allow the carriage of these goods by one or more modes of transport, e.g. road, rail, sea or inland waterway, even by air, without intermediate reloading.

4. The framework provides the structural support for the tank and enables the tank container to be handled (usually lifted), stacked, secured and transported as a whole unit at locations such as port, rail and freight forwarding terminals, and users' sites. The tank(s) can be filled and emptied without removal from the framework.

Design and construction of tank containers

5. Many tank containers used in international carriage will conform to the requirements of the International Convention for Safe Containers (CSC); this Convention is implemented in Great Britain by the Freight Containers (Safety Convention) Regulations 1984. The Convention sets structural requirements to ensure safety in the handling, stacking and transporting of containers in the course of normal operation. National and international standards [1, 2] define the standard sized container types and rigid dimensional tolerances, which operated in road, rail, and sea transport modes. Tank containers manufactured to these international standards are often termed 'ISO tanks'.

6. Where tank containers are constructed to such standards, no parts of the container, its associate fittings and/or equipment should project beyond the specified overall external dimensions. The implication being that such equipment may become damaged or fouled in the

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[1] **ISO 668: 1995** ***Series 1 freight containers – Classification, dimensions and ratings.***

[2] **ISO 1496-3: 1995** ***Series 1 freight containers – Specification and testing – Part 3: Tank containers for liquids, gases and pressurized dry bulk*****.**

handling, stacking and transportation of containers, and threaten the integrity of the container. Standards do give design criteria for access ladders and walkways, but they do not cover equipment such as handrails.