ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods Joint Meeting of Experts on the Regulations annexed to the European Agreement concerning the International Carriage of Dangerous Goods by Inland Waterways (ADN) (ADN Safety Committee)

Fourteenth session Geneva, 26-30 January 2009 Agenda item 9

ANY OTHER BUSINESS

Application by the Federation of European Tank Storage Associations (FETSA) for consultative status

The secretariat has received from FETSA (see attached letter) a request for participation in the work of the Safety Committee as an observer non-governmental organization.



Federation of European Tank Storage Associations

> Mr Olivier Kervela Chief Dangerous goods and Special Cargo Section Transport Division UN Economic Commission for Europe Palais des Nations CH-1211 Geneva

July 22, 2008

Concerns: Application for separate status concerning ADN policies

Dear Mr Kervela,

The Federation of European Tank Storage Associations (FETSA) combines the seven national Tank Storage Associations of Belgium, France, Germany, Italy, Spain, The United Kingdom and The Netherlands. Through the possibility of Associated membership, individual companies in Sweden and Turkey belong to the FETSA "family" also. These seven national associations and associated member companies together comprise well over 100 enterprises with a combined storage capacity in Europe of about 51 million cubic metres, which is about half of the worldwide independent storage capacity.

Tank Storage obviously deals with very large volumes of liquid products, mostly from a mineral oil or chemical origin. It should be mentioned here that FETSA stands for the independent tank storage sector, implying that our members do not own, trade, produce, change or market the products they store. Our Members provide a necessary link between the various modes of transport of liquid products in bulk. Tank storage is a logistics service provider and a part of the transport chain. It can be quite readily seen that Tank Storage maintains various interfaces withy the various modes of transport and indeed one may find at one Tank Storage terminal rail end road loading and off-loading facilities, jetties to accommodate seagoing vessels for maritime transport, pipeline connections and jetties to handle the traffic with inland shipping.

FETSA's main role is to monitor the development of European (and other) legislation that potentially may affect the tank storage industry or its business environment and to deploy the knowledge and skills of its members to assist the development of effective and workable regulations. We seek to make a contribution in co-operation with many other industry associations in the European Union's administrative centre. FETSA was established under the administrative procedures of the Kingdom of Belgium in 1992 and is headquartered in Brussels. No doubt that many of the bodies of law referred to are concerned with environmental controls, hazard prevention, occupational safety, operational safety, security and the like.

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Federation of European Tenk Storage Associations

> For this reason FETSA was happy to have non-governmental status with the Committee for the Navigation on the Rhine. It should be mentioned that likely the largest and most intense interface between ship and shore in inland shipping is between the sweet water transport sector and us. It may be added here that there also many inland riverside Tank Storage terminals. And of course this is precisely our reason for writing to you. We are quite aware of the change from the ADNR to the ADN and the fact that the forum for this has shifted from the CCNR in Strasburg to the UN ECE in Geneva. In short we will be most happy to apply for and to obtain a standing participation in this forum both as contributors of expertise and as stakeholders.

> We feel confident that we will make a sensible contribution building on a long standing expertise. We would be pleased if you would be so kind to indicate what steps need be taken to attain this, it goes without saying that we will be always prepared to illustrate our case verbally whenever required.

Awaiting your reply,

Yours Faithfully,

Federation of European Tank Storage Associations

Standaar, secretary-general Hennie

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