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Contacting Parties to ADR

M320 Explanatory Letter

To ADR Contracting Parties


Dear Madam, Dear Sir


Following the introduction of special provision 657 in chapter 3.3 of ADR 2013, oil refineries and other gas processing plants reclassified their products with the trade name "propane", from UN 1978 PROPANE to UN 1965 HYDROCARBON GAS MIXTURE, LIQUEFIED, N.O.S. (Mixture C, Propane). However, a substantial number of the fixed tanks used at that time to transport the product with the trade name "propane", meeting the criteria for test pressure for UN 1978, did not meet the criteria for test pressure for UN 1965, mixture C.

ADR provided no transitional provision for the amendment mentioned above, and there were no alternative uses for these tanks. To prevent decommissioning and scrapping of the tanks in question, Norway initiated multilateral agreement M278 to provide for a transitional period. Now in 2019, there is still a substantial number of these tanks in service. To remove them all from service will mean a great loss of economic values for the operators. No accident or incident is recorded related to the derogations provided for by multilateral agreement M278.

Norway therefore now initiates M320 to replace and supersede M278 to provide for an additional transitional period. Considering the fact that this problem is affecting Scandinavian countries with modest ambient temperatures, a reference temperature of 50 °C instead of 65 °C is used for the calculated test pressure.

Yours faithfully
Norwegian Directorate for Civil Protection


Gry Haugsnes
Head of Section


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