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UKPIA response to the consultation on fuel tanker weight limits: temporary changes during periods of fuel supply disruption

The UK Petroleum Industry Association (UKPIA) represents the eight main oil refining and marketing companies and a number of the smaller standalone operators and oil storage terminals operating in the UK. Together, these companies are responsible for the sourcing and supply of petroleum products meeting over 85% of UK inland demand, accounting for a third of total primary UK energy¹.

UKPIA does not have specific technical expertise in fuel tanker technology and development. However, UKPIA does have experience setting up and administering third party competence schemes that are in use in the distribution and marketing component of the sector's value chain. They are the Safe Load Pass (SLP) and the Petroleum Drivers Passport (PDP).

The SLP scheme is in place to ensure that fuel tankers are presented to a terminal to load in a safe state. Compliance with this scheme is monitored by the terminals. It underpins the terminals Control of Major Accidents and Hazard (COMAH) Safety Report and gives them assurance the vehicles are safe to load. The PDP is a scheme where the drivers must demonstrate their competence to load, convey and unload petroleum products.

UKPIA agrees with the principle of fuel tankers being permitted to operate at increased weights with conditions in place to ensure the tankers are operated safely and risk is minimised during a fuel supply disruption. However, we have significant concerns over potential exceedance of the maximum permitted GB axle weights or the design weight of the vehicle. We therefore ask that this risk is properly considered when setting maximum fuel loading.

¹ [BEIS Digest of UK Energy Statistics \(DUKES\) 2022 Tables 3.2-3.4.](#)

The terminals are reliant on the driver to be aware of any existing product left onboard and this is a part of the rigorous training drivers undergo before loading vehicles. Taking into account the relevant human factors involved, there are also other controls preventing overfill at the terminals. Diesel in the UK tends to be approximately 12% heavier than petrol and it is possible to load a vehicle to its volumetric capacity at a terminal. Many terminal loading systems have details of each vehicle and its compartment configuration, so it is important that the additional carrying capacity must be focussed on axle weight limits rather than volume.

Most fuel tankers leave a terminal with a mix of different products in their compartments. Each product will have a different specific density (for example petrol has a typical Specific Gravity or SG (relative to water) of around 0.745, with diesel having one of 0.845. So, when hauliers put a multi-grade delivery order together, they have to factor in the typical SG of each product to ensure compliance with the allowable weight limit of the load. The issue is that products of different densities mean that hauliers have to reduce the amount in certain compartments to meet the axle weight criteria by managing the fuel compartment configuration for those products. It is, therefore, very important that the maximum axle weight criteria are not exceeded as this would impact the safe operation of the vehicle, leading to the risk of tank trailer failure, and loss of hazardous fuel containment.

Thank you for considering our views. Please do contact me if you require further information.

Yours sincerely,

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