

**Committee of Experts on the Transport of Dangerous Goods
and on the Globally Harmonized System of Classification
and Labelling of Chemicals**

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**Sub-Committee of Experts on the Transport of
Dangerous Goods**

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Item 6 (b) of the provisional agenda

**Miscellaneous proposals for amendments to the
Model Regulations on the Transport of Dangerous
Goods: packagings**

**Suggestions on the work of the working group on FRP
portable tanks**

Transmitted by the expert from the Netherlands

Introduction

1. As announced in informal document INF.13 (55th session) the working group on FRP portable tanks will meet in parallel to the coming plenary session. For this upcoming meeting of the group, the Netherlands has a few suggestions for furthering the work of the working group.

Discussion

2. While we recognise the importance of the technical discussion that is needed to complete this work, we suggest first revisiting some of the general underlying principles before pondering the technical details. We believe a joint understanding and agreement on some of the underlying aspects will expedite future work. Below, we list a few aspects we believe will benefit from further considerations.

3. An important aspect is the safety equivalency of an FRP tank as compared with a metal tank. It is not straightforward how to compare the strength of an FRP tank to that of a metal tank as wall thickness, a measure of the strength of a metal tank, may not be the most useful measure for the strength of an FRP tank. We would welcome further discussion on how to compare and ensure the equivalence of these two tank types (parameters, calculations, performance tests, etc.).

4. Similarly, we encourage further discussion on the k-factors, in particular the implications of extending the range of substances to be transported in FRP tanks as well as more diverse transport conditions on the proposed k-factors. The effects of changing the k-factors are difficult to oversee in terms of safety, strength and performance of the tank.

5. Noting the recent discussions on FRP tanks at the IMO and the ADR/RID/ADN Joint Meeting levels, we stress the importance that the performance of these tanks be sufficient for multimodal transport. Among the aspects to consider include salt-water spray tolerance, fire

engulfment of 60 minutes, 2 MPGM testing and strains due to mechanical handling for sea transport as well as inland transport. Defining the necessary performance is crucial for the further development of the provisions.

6. On other aspects of the proposed provisions, we welcome the inclusion of heating/cooling elements into the provisions and would appreciate further discussions on the conditions for the safe use of such elements seen from a multimodal perspective.

7. With regard to the quality management system, the goal, intention and implications should be clear before deciding upon the location and level of detail appropriate for the Model Regulations.

8. Furthermore, it should be considered whether special inspections and test are required to guarantee a safe use over time, and whether there is a need to limit the service life.
