

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

Sub-Committee of Experts on the Transport of Dangerous Goods

27 November 2017

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Item 6 (c) of the provisional agenda

Miscellaneous proposals for amendments to the Model

Regulations on the Transport of Dangerous Goods:

portable tanks

Comments on ST/SG/AC.10/C.3/2017/40 - (Russian Federation): Fibre-reinforced plastics portable tanks

Transmitted by the International Dangerous Goods and Containers Association (IDGCA)

Introduction

1. IDGCA supports the proposal of the Russian Federation for the introduction into the Model Regulations Recommendations on the Transport of Dangerous Goods requirements for the fibre-reinforced plastics (FRP) portable tanks.
2. IDGCA supports the opinion of experts from Finland, as set out in document UN/SCETD/52/INF.36 that the requirements for FRP tanks, as set out in Chapter 6.9 of the ADR, are sufficient and adequate and are applied for a long time. We believe that the basis for the new chapter of Model Regulations should be the content of chapter 6.9 of the ADR.
3. IDGCA experts do not consider it necessary to include paragraph 6.9.3.2.10 "Fabrication process for FRP shells" in the Model Regulations, as this will enslave manufacturers in creating new types of composite materials. According to IDGCA experts, the requirements for the technology should be established by the manufacturer and contained in the manuals, instructions and standards.

Proposal

4. IDGCA invites UN experts to support the proposal of the Russian Federation for the introduction into the Model Regulations Recommendations on the Transport of Dangerous Goods requirements for the FRP.
 5. In preparing Chapter 6.9 of the Model Regulations Recommendations on the Transport of Dangerous Goods, take into account the points set out in paragraphs 2 and 3 of this document.
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