

**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 (c) of the provisional agenda

**Miscellaneous proposals for amendments to the Model Regulations
on the Transport of Dangerous Goods: fibre-reinforced plastics (FRP) portable tanks**

Informal working group on FRP portable tanks

Transmitted by the expert from the Netherlands

Introduction

1. The Netherlands participates in the working group on Fibre Reinforced Plastics (FRP) portable tanks, in which the design and construction requirements of these type of portable tanks are being developed.

Discussion

2. In our opinion, the entirety of the proposed requirements for FRP portable tanks must provide level of safety equivalent to that of conventional metal portable tanks. This level of safety should be achieved across a number of criteria such as internal pressure and fire resistance, but also the ability to withstand mechanical damage. With the new proposed requirements in informal document INF.43 (57th session), we feel it is not demonstrated that the FRP portable tanks possess sufficient resilience against mechanical damage.

3. Additionally, we are of the opinion that some testing is required in order to demonstrate that an equivalent level of safety is achieved for FRP portable tanks when compared to conventional metal portable tanks. This has not yet been discussed by the working group.

4. We previously raised our concerns about the safety and equivalence of FRP tanks in informal document INF.39 (55th session) in June 2019. Furthermore, we have circulated a discussion paper to the FRP working group to address this issue again for the virtual meeting that took place on 24 November 2020. We think that the concerns we raised in these documents have not yet been sufficiently addressed.

5. As the validation of the appropriate level of safety for multimodal use of FRP portable tanks has not yet been shown, we are therefore of the opinion that the proposal in informal document INF.43 (57th session) is not sufficiently mature and that further work is required before we can support adoption of the proposal.
