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| **Committee of Experts on the Transport of Dangerous Goods  and on the Globally Harmonized System of Classification and Labelling of Chemicals 1 December 2020** |
| **Sub-Committee of Experts on the Transport of Dangerous Goods**  **Fifty-seventh session**  Geneva, 30 November-8 December 2020  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** |

Report of the informal working group on fibre-reinforced plastics (FRP) portable tanks

Transmitted by the expert from the Russian Federation

1. The Russian Federation welcomes the report of the Informal Working Group on Fibre-Reinforced Plastics (FRP) portable tanks (ST/SG/AC.10/C.3/2020/57 as amended by ST/SG/AC.10/C.3/2020/57/Rev.1 and informal document INF.43 (57th session)).

2. Keeping in mind the concerns stated in informal documents INF.48 and INF.49 (57th session) we would like to pay attention that the long-term practice in the design, manufacturing and operation of metallic portable tanks and multiple-element gas containers does not confirm the need to introduce new requirements to Model Regulations Chapter 6.7 on the validation or benchmark testing of accidental and in-service damage in likely impact situations. Therefore, there is no reasons to apply this to FRP tanks.

3. Since 2015, FRP portable tanks have been used for transport of hydrochloric acid by road and rail in the Russian Federation. The obtained statistics of service damage and repair has confirmed the safety level, which is definitely not lower than the safety level of metallic portable tanks and multiple-element gas containers. These FRP tanks were designed and produced according to requirements drafted by the Russian Federation in ST/SG/AC.10/C.3/2017/40 (the original draft for the Informal Working Group on FRP portable tanks start-up). Some interim operation results were also reported via informal documents INF.44 and INF.46 (52nd session).

4. Moreover, as far as we know no reports have been submitted for the attention of ISO or other engaged bodies about accidents with FRP tanks with catastrophic consequence.

5. Considering paragraphs 1-3 above, we truly believe that the technical specifications and provisions proposed by ST/SG/AC.10/C.3/2020/57 as amended by ST/SG/AC.10/C.3/2020/57/Rev.1 and informal document INF.43 (57th session) for the adoption provide an appropriate level of safety without validation or benchmark testing of accidental and in-service damage in likely impact situations.

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