

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

27 November 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 United Kingdom

1. Further to the report of the informal working group on fibre-reinforced (FRP) portable tanks in informal document INF.43 (57th session), and in the absence of results from suitable tests to benchmark and validate the proposals to ensure that the resilience of FRP portable tanks to accidental and in-service damage in likely impact situations is the same as, or better than, that of conventional metallic portable tanks, the United Kingdom, whilst supportive of scientific and technical progress in principle, is not certain that the technical specifications and provisions proposed for adoption provide an appropriate level of safety and so is not ready at present to support the adoption of the proposal and believes that further discussions, both on impact testing and fire resistance, are needed before it can be considered for adoption.
 2. The United Kingdom first raised these concerns in informal document INF.43 (55th session) and again in a document suggesting how the resilience of FRP portable tanks might be assessed which was briefly discussed during the meeting of the informal working group held on 2 September 2020. The subject was further discussed during the meeting of the informal working group held on 24 November 2020, but despite the majority of the working group indicating that they believe the technical specifications and provisions proposed for adoption provide an appropriate level of safety without validation or benchmark testing, the United Kingdom remains unaware of any such test results or evidence from experience from either the industry or researchers that would afford the United Kingdom a similar view.
 3. Accordingly, given the need for further information to support the proposal, the United Kingdom believes that the proposal should not be adopted until further discussions have been held to verify that the proposals are fit for use and suitable for the various modes.
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