

## 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

29 November 2023

### Sixty-third session

Geneva, 27 November-6 December 2023

Item 6 (c) of the provisional agenda

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

#### Portable tanks

## Additional commentary and proposals to document

### ST/SG/AC.10/C.32/2023/41 (Poland)

#### Transmitted by the expert from Poland

1. With regard to document ST/SG/AC.10/C.32/2023/41 presented by the expert from Poland, we would like to present additional comments and additional proposals regarding proposal 1 and proposal 2 in this document.

#### On proposal 1

2. If the definition of an FRP shell in document ST/SG/AC.10/C.32/2023/41 is accepted, we would like to emphasize that similar changes should be made to the shell definitions given in 6.7.2.1, 6.7.3.1 and 6.7.4.1 of the *Model Regulations*.

3. This means that the correction of replacing the conjunction "or" with the conjunction "and" in the definition of FRP shell should also be introduced in the definitions of portable tanks shell given in 6.7.2.1, 6.7.3.1 and 6.7.4.1 of the *Model Regulations*.

#### On proposal 2

4. In document ST/SG/AC.10/AC.3/124/Add.1 in Annex I, Chapter 9, there is a proposed definition of an FRP portable tank resulting from document INF.43 of the 62<sup>nd</sup> session with the following text:

“FRP portable tank means a portable tank constructed with an FRP shell.”

5. This definition is enclosed in square brackets for rewording and presentation at the next 63rd session of the Subcommittee.

6. Poland has committed to presenting a revised version of the definition of an FRP portable tank.

7. Poland believes that the term "portable tank" included in the definition of a portable tank is not sufficient because there are three definitions of a portable tank in the *Model Regulations* in Chapter 6.7:

(a) in 6.7.2.1, in the definition of a portable tank, indicates that portable tanks meeting the requirements of Chapter 6.7.2 are intended for the carriage of substances of Class 1 and Classes 3 to 9.

(b) in 6.7.3.1, the definition of a portable tank indicates that portable tanks meeting the requirements of Chapter 6.7.3 are intended for the carriage of unrefrigerated liquefied gases.

(c) in 6.7.4.1, the definition of a portable tank indicates that portable tanks meeting the requirements of Chapter 6.7.4 are intended for the transport of refrigerated liquefied gases.

8. FRP portable tanks are not intended for the transport of gases, so the scope of dangerous goods permitted for the transport of dangerous goods should be specified in the definition of an FRP portable tank, similarly to the definition of a portable tank given in 6.7.2.1 of the *Model Regulations*.

9. In the second proposal presented in document ST/SG/AC.10/C.32/2023/41, it is proposed to add a second version of the definition of an FRP portable tank based on the definition of a portable tank given in 6.7.2.1 of the *Model Regulations*.

10. The second version of the FRP portable tank definition would read as follows:

**“FRP portable tank means a multimodal tank used for the transport of substances of Classes or Divisions 1, 3, 5.1, 6.1, 6.2, 8 and 9. The FRP portable tank includes a FRP shell fitted with service equipment and structural equipment necessary for the transport of dangerous substances. The FRP portable tank shall be capable of being filled and discharged without the removal of its structural equipment. It shall possess stabilizing members external to the shell, and shall be capable of being lifted when full. It shall be designed primarily to be loaded onto a transport vehicle or ship and shall be equipped with skids, mountings or accessories to facilitate mechanical handling. Road tank-vehicles, rail tank-wagons, metallic tanks and intermediate bulk containers (IBCs) are not considered to fall within the definition for FRP portable tanks.”**

11. Poland supports the second version of the definition of FRP portable tank presented in this document.

12. Poland asks the Sub-Committee to respond to the presented proposals and accept one of them.

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