

INF.32

ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods

Geneva, 23-26 March 2009

Item 3 of the provisional agenda

STANDARDS

Comments to INF.14 from CEN in conjunction with ECE/TRANS/WP.15/AC.1/2008/16 from
CEN and INF.19 transmitted by Belgium
at the September 2008 session

Transmitted by European Plastic Converters (EuPC)

1. EuPC, covering also the interests of the European manufacturers of plastics packaging for the transport of dangerous goods, took note that paper 2008/16 by CEN proposes to refer to EN 15507 “Packaging – Transport Packaging for Dangerous Goods – Comparative Material Testing of Polyethylene Grades” under ADR/RID, 6.1.5.2.5 and 6.5.6.3.4.. Supporting this proposal EuPC sent INFpaper 2008/INF 11 to the September meeting. The discussion about this standard was postponed because at that time EN 15507 was not yet officially adopted. In October 2008 EN 15507 was adopted with a broad majority of CEN members (19 countries in favour, 4 against and 3 abstained).

2. With paper 2009/INF 14 from CEN the discussion about EN 15507 is put on the agenda again. EuPC explicitly supports the proposal put forward by CEN in September 2008 to refer to EN 15507 for the following reasons:

- Since 2003 national regulations have been in force in Germany and Austria which correspond to EN 15507. The experiences obtained with the application of these national regulations are most positive, there are no safety-related objections, the reduction of inspection expenses (cost and time) is considerable, the manufacturers of plastics packaging of high molecular HDPE have the possibility to act more flexibly in the market.
- The application of the test method as described in EN 15507 helped medium-sized manufacturers of plastics packaging for dangerous goods to run tests for the equivalence of HDPE-types at reasonable expenditure. In many cases a complete compatibility test with all standard liquids was not necessary. Nonetheless the EN also provides a complete design type test with the standard liquid water in case of a change of high-molecular HDPE types.
- The need for the application of such a method increased during the past years as the manufacturers of high-molecular HDPE, due to reorganizations, mergers, takeovers, took several HDPE-types from the market so that alternatives have to be found at short notice. The test methods laid down in this standard showed facilitation of the application of new developed grades of polyethylene plastics material for dangerous goods packagings and IBCs maintaining at the same time an equivalent level of the required proof of the chemical compatibility.

3. Indirectly, this assessment of the equivalent level of safety is challenged by the document 2008/INF 19 from Belgium. In that document it is stated that the standard’s working group did not succeed in acquiring test procedures which guarantees identical results when it is repeated with the same materials or in different laboratories. We like to stress that this (correct) statement is not the crucial point for the mode of operation of EN 15507. The mode of operation of EN 15507 is a **comparison** of specific plastics materials characteristics **obtained at the same time at a single laboratory**. Only if demonstrated for the appropriate competent authority under those conditions that a new polyethylene grade has at least the same performance properties as the “old” plastics material (for which all necessary design type tests had been successfully performed in the past), the test facilitations of EN 15507 can be applied by the competent authority. Even when it cannot be guaranteed to gain identical single test results by replication of the tests, it can be guaranteed to gain the same ranking order by comparing two or more plastics materials.

4. On the basis of the above shown experience gathered since 2003 we suggest to take up references to EN 15507 as follows:

1.) Add a sentence to the last paragraph of 6.1.5.2.5 to read as follows:

„Where the behaviour of the plastics material has been established by other means, the above compatibility test may be dispended with. Such procedures shall be at least equivalent to the above compatibility test and be recognized by the competent authority. **EN 15507: 2008 ‘Packaging – Transport Packaging for Dangerous Goods – Comparative Material Testing of Polyethylene Grades’ is considered to be such an approved equivalent procedure.**“

2.) Add a sentence to the last paragraph of 6.5.6.3.4 to read as follows:

„Where the behaviour of the plastics material has been established by other means, the above compatibility test may be dispended with. Such procedures shall be at least equivalent to the above compatibility test and be recognized by the competent authority. **EN 15507: 2008 ‘Packaging – Transport Packaging for Dangerous Goods – Comparative Material Testing of Polyethylene Grades’ is considered to be such an approved equivalent procedure.**“
