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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

### Sub-Committee of Experts on the Transport of Dangerous Goods

Twenty-fifth session  
Geneva, 5-14 July 2004  
Item 4 (c) of the provisional agenda

#### PACKAGINGS (INCLUDING IBCS AND LARGE PACKAGINGS)

##### Compatibility testing

##### Transmitted by the expert from the Netherlands

### **Introduction**

1. The purpose of this document is to facilitate a discussion with the aim to have the Sub-Committee's opinion on a further need to specify compatibility testing, e.g. more specified provisions or reference to a relevant ISO standard, in the Model regulations.
2. Currently the Model Regulations have a general provision 4.1.1.2 with regard to compatibility and for plastics packagings general requirements in 6.1.4.8, 6.1.4.13 and 6.1.4.19. Some modes have extended this general provision, as the model regulations were found inadequate in this respect, with specific testing provisions, e.g. ADR, RID and ADN in 6.1.6.

### **General view of the Netherlands**

3. The Netherlands are of the opinion that compatibility is an important safety issue and should be regulated on a multimodal level for UN-approved packagings.
4. With regard to the compatibility the following observations were made:
  - the issue of the chemical compatibility of packaging in the Model regulation is covered by a general provision only, and therefore the responsibility of the consignor – this philosophy is followed by IMO;
  - this current situation leads to different interpretation of this general requirement by the modes;
  - the European inland transport regulations (RID/ADR/ADN) have incorporated in their provisions specific requirements for the compatibility of several types of plastics materials (see RID/ADR 6.1.5.2.5, 6.1.5.2.6 and 6.1.6). In the RID/ADR 2005 amendments new requirements for the verification of the chemical compatibility of plastics packagings and IBCs have been introduced (see RID/ADR 4.1.1.19, 6.1.5.2.5, 6.1.5.2.6 and 6.1.6);
  - standard EN ISO 16101:2004 has been adopted which covers these new provisions of RID/ADR 2005, and it is to be expected that RID/ADR will make a reference to this standard in the future; and,
  - the ICAO/DGP indicated at its 19<sup>th</sup> meeting that more specified provisions are needed, but felt that this is not a specific airmode issue but a multimodal issue and should therefore be raised at UNSCETDG level;

5. To avoid lengthy detailed provisions in the model regulations a possible way forward is to introduce more specific requirements by a reference to a relevant standard.

6. Furthermore for a reference to a standard two options are feasible, namely a mandatory reference or a reference with a guidance purpose. In the view of the Netherlands these options have the following Pro's and Con's:

	Pro	Con
Mandatory reference	+ compliance + enforcement + unambigues use	- responsibility of the authorities - less flexibility
Guidance	+ responsibility of the consignor + more flexible + less administrative burden for the industry	- multi interpretable - non-unambigues use - maybe less safe

**Action requested of the Sub-Committee:**

7. To take note of the information given by the Netherlands and to discuss the possible need for more specific requirements for compatibility verification/testing in the Model Regulations.

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