
**ECONOMIC COMMISSION FOR EUROPE
INLAND TRANSPORT COMMITTEE**

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

(Bern, 26-30 March, 2007)

Item 3 of the provisional agenda

**Proposed decision in principle on the allocation of compatibility test requirements
to ADR/RID and/ or standards**

Submitted by the WG Standards

1. The outcome of the discussion of plenary on **ECE/TRANS/WP.15/AC.1/2007/12** (“Reference in ADR/RID to CEN standards on plastics compatibility testing”) was understood by the Standards WG as follows:

Prepare a decision in principle on the future contents of ADR/ RID with respect to requirements

- on the chemical compatibility of plastics packagings and IBC’s as part of the design type approval procedure and
- on users obligations to evaluate the compatibility of actual substances and

and to give guidance to CEN on how to redraft the two standards concerned (EN ISO 16101 and prEN ISO 23667) to make them suitable candidates to be taken into reference in ADR/RID.

The following aspects were asked to be considered in this respect:

- Moving the issue on the UN level;
 - Identification of elements to be kept in ADR/RID,
 - Aspects related to the assimilation list (to be kept in ADR/RID or moved to the standards, compliance with the dangerous goods list, flexibility to account for progress in experience and knowledge, approval procedure for amendments);
 - Consequences for the user groups (test houses and users) with respect to availability of legal texts and standards, including the option of publication of text on the internet;
 - Merger of both standards;
 - Extension of chemical compatibility requirements to other types of plastics material or to other types of materials.
2. It was noted that the members of the WG had not received copies of EN ISO 16101 and prEN ISO 23667 on which to comment and was forced therefore to restrict its discussion to the ADR/RID text.

Some aspects mentioned above, such as aspects of the assimilation list, publication on the internet and extension to other types of material couldn’t be discussed in view of the limited expertise available in the WG.

3. The WG identified the following constituent elements of the ADR/RID:

- The design type testing scheme with standard liquids (design type testing with a few substances representing the damaging effect of actual substances and to correlate the damaging impact of actual substances by laboratory/ material tests);
- the option to shorten the testing time compared with UN for certain types of plastics materials at an elevated temperature;
- a detailed specification of the standard liquids;
- the description of the laboratory tests;

- the assimilation list with all those substances, for which a relationship with standard liquids is stated and where the user is not required to demonstrate the compatibility of an actual substance;
- assimilation procedures describing methodologies to relate actual substances classified under general entries to standard liquids.

Except for the description of the laboratory tests, all elements are part of the existing ADR. The description of the laboratory tests is given in RID, in addition.

4. The WG recalled the discussion in plenary on the option to refer the subject to the UN level, which was seen negative in view of the different interpretation of the general UN compatibility requirement in Europe and other regions of the world and the negative response of the UN TDG Subcommittee on a Dutch paper in favor of an incorporation of the European system in the UN Model Regulation and a joint presentation by Germany and ICPP about a comparative view on both systems.
5. The following elements were considered to include requirements to be kept in ADR/RID:
 - The design type testing scheme with standard liquids and at an elevated temperature as given in 6.1.5.2.6 and 6.5.6.3.5.
 - The option to extend the results of a design test with standard liquids on actual substances with the help of laboratory tests either as part of the design type approval procedure as given in 6.1.4.2.7 and 6.5.6.3.6 or as option to discharge the filler obligation to demonstrate compatibility for actual substances as given in 4.1.1.19.1.
6. Irrespective of whether or not the Joint Meeting would be prepared to replace some part of the existing text to an adequate standard or standards the handling of the issue would be facilitated by merging the packaging and IBC compatibility test standards and by the removal of the texts on the design type testing procedures in order to remove large parts of overlap with ADR/RID.
7. More options could be discussed and more guidance to CEN could be given, when the text of standards EN ISO 16101 and prEN ISO 23667 have been made available to the members of the Joint Meeting.