



**Economic and Social  
Council**

Distr.  
GENERAL

TRANS/WP.15/AC.1/2003/46  
6 May 2003

Original: ENGLISH

---

**ECONOMIC COMMISSION FOR EUROPE**

**INLAND TRANSPORT COMMITTEE**

**Working Party on the Transport of Dangerous Goods**

**Joint Meeting of the RID Safety Committee and the  
Working Party on the Transport of Dangerous Goods**  
(Geneva, 1-10 September 2003)

**REVISION OF THE PROOF OF THE CHEMICAL COMPATIBILITY WITH LIQUIDS  
FOR PLASTIC DRUMS AND JERRICANS, COMPOSITE PACKAGINGS  
(PLASTICS MATERIAL), RIGID PLASTICS IBCS AND COMPOSITE IBCS  
(TRANS/WP.15/AC.1/2003/20 AND ADD.1)**

**Transmitted by the Government of the United Kingdom**

**General remarks**

The United Kingdom has the following comments on the German proposal TRANS/WP.15/AC.1/2003/20 and Add.1.

The United Kingdom agrees with Germany that in the restructured RID/ADR the text dealing with standard liquids – the old Annex to Appendix A5 in the 1999 edition - has not been correctly interpreted and that some changes are needed to render its meaning clear.

---

**\***/ Circulated by the Central Office for International Carriage by Rail (OCTI) under the symbol OCTI/RID/GT-III/2003/46.

The United Kingdom recognizes that this German proposal attempts to do this, but notes that it also adds a lot of new text, much of it based on the draft CEN standard which is currently out for voting. The vote is expected to be completed by the summer. If the German proposal is adopted, there consequently could be a CEN standard and provisions in RID/ADR existing at the same time. This seems unnecessary; since the CEN standard concerned will be subject to scrutiny by the Joint Meeting working group, it should be sufficient simply to reference the standard concerned if it is deemed by that working group to be satisfactory.

Such a duplication of provisions is in principle undesirable. Furthermore, the United Kingdom considers that much of the text concerned will not be relevant to ordinary users on a day to day basis, but will be used mainly on a one off basis by chemical companies and packaging manufacturers. However, including the text of the German proposal in RID/ADR could add nearly 100 pages to a book of 1200 pages (it should be noted that the current IMDG Code is less than 1000 pages). Given that this information will not be needed at present, a CEN standard would seem to be the right home for it.

The United Kingdom understands that Germany agreed at the Bad Homburg meeting that if the CEN standard was adopted, many of these proposals need not be adopted or could be removed from RID/ADR. This being so, the United Kingdom considers that it would be sensible to defer further discussion of the proposal until the September 2003 session, when the position regarding the standard concerned should be clearer.

#### **More detailed comments**

1. 4.1.1.2 requires compatibility to be assessed. There is no cross reference from 4.1.1.2 to 4.1.1.19. It would be preferable, if this is really going to be adopted, to simply put a note in 4.1.1.2 to the effect:

NOTE: for chemical compatibility of plastics packaging made from high and medium molecular mass polyethylene see XXX.

2. The proposal in 4.1.1.19 is to make this applicable to packaging and IBCs. The standard liquids have never been applied to IBCs in RID/ADR. Whilst, there may be some logic to doing so, this is a completely new concept and should be the subject of a fully justified proposal. There will also need to be changes to Chapter 6.8.
3. The text of 4.1.1.19. Part 4 of RID/ADR is intended for day to day use. This type of text would be better placed in Part 6, especially as it deals only with a single type of plastics material. HDPE has been in common use for plastics packaging for over 30 years, but more recently in particular PET and also polypropylene, PVDF and PVC have taken a significant part of the market.
4. Nearly all of the proposed text in 4.1.1.19.2 – 4.1.1.19.6 is related to testing, and would be better placed in Part 6. Part 4 is intended for day-to-day use.

5. If the Joint Meeting really insists on incorporating the assimilation list (30-40 pages) then a sample paragraph based on 4.1.1.19.6 plus a note on how to deal with generic entries is all that is required.

6. Amendment to Part 6.

In Part 6.1 the changes are basically correct except for:

(a) the footnote in 6.1.5.2.7 refers to the RID laboratory tests which have never been adopted by ADR. They will be overtaken by the CEN standard and the whole concept is a new one for ADR.

(b) 6.1.6.2 Germany is correct in deleting this list but adding 30/40 pages to RID/ADR is surely unnecessary. It should be sufficient simply to refer to the CEN standard.

7. Part 6.5 It is a completely new proposal to add this text for IBCs, which has been included in the proposal without warning.

---