

## Transmitted by the Government of the Netherlands

### **Comments on document TRANS/WP.15/AC.1/2003/20 (OCTI/RID/GT-III/2003/20) of Germany**

Revision of the proof of the chemical compatibility with liquids for plastics drums and jerricans, composite packagings (plastics material), rigid plastics IBCs and composite IBCs

In document TRANS/WP.15/AC.1/2003/20 (OCTI/RID/GT-III/2003/20) Germany proposes a revision of the proof of the chemical compatibility with liquids for plastics drums and jerricans, composite packagings (plastics material), rigid plastics IBCs and composite IBCs.

The Netherlands fully supports in principle the contents of the document. However, The Netherlands would like to point out that there exists a draft CEN/ISO-standard (EN ISO 16101) which is now in its final voting stage and is expected to become available as standard in 2003. This standard deals with plastics compatibility testing of transport packaging for dangerous goods and includes all the details for the proof of the chemical compatibility for packagings. The contents of the standard is comparable to the German document.

The Netherlands proposes to make reference to this standard in the RID/ADR-regulations instead of incorporating a very detailed procedure as proposed in the German document.

Reference to the standard would have the following advantages:

- It is avoided that procedures with a lot of detail have to be evaluated by the Joint Meeting and incorporated into the regulations.
- It is also avoided that any changes, which would need the view of experts, would also have to be considered by the Joint Meeting.
- The EN ISO 16101 standard also includes up-to-date laboratory methods for assimilation of substances to standard liquids, while the German document makes reference to an unofficial RID document, which is not up-to-date anymore.