ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

<u>Joint Meeting of the RID Safety Committee and the Working Party on the Transport of Dangerous Goods</u> (Bern, 7-11 March 2005)

NEW PROPOSALS OF AMENDMENTS TO RID/ADR/ADN

Compatibility testing of plastics packaging

Transmitted by EuPC European Plastic Converters

Comment to Proposal TRANS/WP.15/AC.1/2005/9 from the Netherlands

EuPC supports basically the proposal from the Netherlands to update the present system of compatibility testing in RID/ADR and the amendments as in the above paper. As a result of INFpaper 23 by EuPC concerning the further use of existing approvals of design types which are not tested with alkyl benzene sulphonate the paper suggests, as proposal 2, two different options to handle this problem:

Option 1 provides a transitional period of 5 years for existing design types approvals, afterwards a test with alkyl benzene sulphonate would be necessary.

Option 2 provides unlimited further use of existing design type approvals.

As representative of the European manufacturers of Plastics Packaging for Dangerous Goods EuPC favours Option 2 of the paper and asks the member of the Joint Meeting to opt for the following proposal:

Insert a transitional measure to read:

1.6.1.x Type approvals for drums, jerricans and composite packagings made of high or medium molecular mass polyethylene issued before 1 July 2007 in accordance with the requirements of 6.1.5.2.6 juncto 6.1.6.1 (a) in force up to 31 December 2006, but which are not in accordance with the requirements of 6.1.6.1 (a), continue to be valid.