STANDARDS */

Reference in ADR/RID to CEN standards on plastics compatibility testing

Transmitted by European Committee for Standardization (CEN)

1. In recent years CEN /TC 261/SC 5/WG 16 together with ISO/TC 122/SC 5/WG 8 developed standards on the compatibility testing of plastics packagings and IBCs, based on the European regulations for the transport of dangerous goods by road and rail (ADR/RID).

2. The standard on the packaging compatibility testing has been published (EN ISO 16101: 2004). Following a parallel (CEN/ISO) vote and a critical assessment by the CEN consultant the IBC Compatibility testing standard (prEN ISO 23667:2005) has been redrafted. The meeting of the joint CEN/ISO working group in October resolved that the new draft should be re-balloted as a final draft. The results of this ballot should be known by the summer of 2007.
3. Both standards give more details on the compatibility testing of packagings and IBCs, which is important in order to reach a better harmonisation and reliability of compatibility proofs in Europe. The standards include an assimilation procedure and a list of substances, which can be assimilated to standard liquids. Moreover, the standards comprise detailed descriptions of the laboratory methods, which can be used in order to determine the assimilation of substances to standard liquids, when assimilation with the list is not possible.

4. Rather than to refer to the standard on the packaging compatibility testing, the Joint Meeting preferred to incorporate essential parts of this standard (at that time the prEN ISO 16101: 2003) - the assimilation procedure and the list of substances (assimilation list) into the ADR/RID, however, with some amendments. The description of the laboratory methods was left with the standard. Reference to the completed standards in future was kept open, as an option. Reference is made in this respect to the report of the September meeting 2003 (OCTI/RID/GT-III/2003-B–TRANS/WP.15/AC.1/94), paras. 87 – 91.

5. It is noted that both standards were criticized because they contain regulatory text (for user-friendliness). In addition, both standards are repeating themselves in main parts.

6. The amendments to the assimilation list, decided by the Joint Meeting in 2003 have been considered for the final version of the IBC compatibility test standard but not yet with the packaging compatibility test standard.

7. Overall, the situation is not satisfactory. CEN is interested in improving this situation and would be prepared to amend these standards in order to make them candidates to be taken in reference in ADR/RID. In order to facilitate referencing, the following is proposed:

   (a) Merger of the standards on the compatibility testing of packagings and IBCs into a single standard;

   (b) Adaptation of the merged standard such, that regulatory text in the testing part is removed. The assimilation procedure and the assimilation list (amended to the ADR/RID version) could and the description of the laboratory methods should be retained.

8. Dependent on what the Joint Meeting would like to keep in ADR/RID the standard could then be adapted consequently, refraining to repeat any ADR/RID text.

9. The Joint Meeting is invited to give guidance to CEN how to proceed further with the standards on compatibility testing of packagings and IBCs and to give its opinion on the proposal as submitted above.