

**ECONOMIC COMMISSION FOR EUROPE**

**INLAND TRANSPORT COMMITTEE**

Working Party on the Transport of Dangerous Goods

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

Geneva, 15-19 September 2008  
Item 3 of the provisional agenda

**STANDARDS**

Comments to Document ECE/TRANS/WP.15/AC.1/2008/16  
Transmitted by European Plastic Converters (EuPC)

EuPC, covering also the interests of the European manufacturers of plastics packaging for the transport of dangerous goods, took note that paper 2008/16 by CEN proposes to refer to EN 15507 “Packaging – Transport Packaging for Dangerous Goods – Comparative Material Testing of Polyethylene Grades” under ADR/RID, 6.1.5.2.5 and 6.5.6.3.4.

EuPC explicitly supports this proposal for the following reasons:

- Since 2003 national regulations have been in force in Germany and Austria which correspond to prEN 15507. The experiences obtained with the application of these national regulations are most positive, there are no safety-related objections, the reduction of inspection expenses (cost and time) is considerable, the manufacturers of plastics packaging of high molecular HDPE have the possibility to act more flexibly in the market.
- The need for the application of such a method increased during the past years as the manufacturers of high-molecular HDPE, due to reorganizations, mergers, takeovers, took several HDPE-types from the market so that alternatives have to be found at short notice. The application of the test method as described in prEN 15507 helped medium-sized manufacturers of plastics packaging for dangerous goods to run tests for the equivalence of HDPE-types at reasonable expenditure. In many cases a complete compatibility test with all standard liquids was not necessary. Nonetheless the prEN also provides a complete design type test with the standard liquid water in case of a change of high-molecular HDPE types.

On the basis of this experience we suggest to take up references to EN 15507, once it is approved, as follows:

1.) Add a sentence to the last paragraph of 6.1.5.2.5 to read as follows:

„Where the behaviour of the plastics material has been established by other means, the above compatibility test may be dispended with. Such procedures shall be at least equivalent to the above compatibility test and be recognized by the competent authority. **EN 15507:[2009] ‘Packaging – Transport Packaging for Dangerous Goods – Comparative Material Testing of Polyethylene Grades’ is considered to be such an approved equivalent procedure.**“

2.) Add a sentence to the last paragraph of 6.5.6.3.4 to read as follows:

„Where the behaviour of the plastics material has been established by other means, the above compatibility test may be dispended with. Such procedures shall be at least equivalent to the above compatibility test and be recognized by the competent authority. **EN 15507:[2009] ‘Packaging – Transport Packaging for Dangerous Goods – Comparative Material Testing of Polyethylene Grades’ is considered to be such an approved equivalent procedure.**“

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