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, 23-26 March 2009

STANDARDS

Comments of Belgium to documents ECE/TRANS/WP.15/AC.1/2009/1 and INF. 14

INF. 19 of the September meeting of the RID/ADR/ADN joint meeting touched upon the controversial character of prEN 15507 "Packaging – Transport Packaging for Dangerous Goods – Comparative Material Testing of Polyethylene Grades". It was reminded that in the working group that discussed this standard for over 8 years, it had never been demonstrated that:

- the test procedure guarantees identical results when it is repeated with the same substances;
- the test procedure guarantees identical results for the same substances in different laboratories.

Moreover, over the last two years, the Belgian test laboratory for packagings BVI-IBE has tested a number of materials that were deemed to be equivalent according to prEN 15507, using the tests with standard liquids for verifying the chemical compatibility. In more than 60 % of the cases, these tests showed diverging results.

Because of the fact that standard EN 15507 was not included in the list of standards intended to be referenced in RID/ADR/ADN of document ECE/TRANS/WP.15/AC.1/2009/1, Belgium did not introduce for this meeting a document with more detailed technical arguments against referencing this standard.

But in INF. 14, CEN lists EN 15507 amongst the pending issues from earlier sessions for which the obstacles may have been removed meanwhile and conclusions could be drawn. It may be noted, however, that in its INF 12rev of last meeting, the working group commented "Taking account of INF. 19, questioning the validity of the procedures described in prEN 15507, the STDs WG will await an adequate response and the result of the voting on this standard...". Whilst the voting has taken place in the mean time, no response of any kind has been given.

Because of the above, Belgium proposes to postpone the discussion on standard 15507 until the next joint meeting.