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**COMMITTEE OF EXPERTS ON THE TRANSPORT OF
DANGEROUS GOODS AND ON THE GLOBALLY
HARMONIZED SYSTEM OF CLASSIFICATION
AND LABELLING OF CHEMICALS**

Sub-Committee of Experts on the
Transport of Dangerous Goods

Twenty-sixth session, 29 November-3 December 2004
Item 6 of the provisional agenda

PROGRAMME OF WORK FOR THE BIENNIUM 2005-2006

Compatibility testing

Transmitted by the expert from the Netherlands

Introduction

1. The purpose of this document is to facilitate a discussion with the aim to have the Sub-Committee's opinion on a further need to specify compatibility testing, e.g. more specified provisions or reference to a relevant ISO standard, in the Model Regulations.

2. Currently the Model Regulations have a general provision 4.1.1.2 with regard to compatibility and for plastics packagings general requirements in 6.1.4.8, 6.1.4.13 and 6.1.4.19. Some modes have extended this general provision, as the Model Regulations were found inadequate in this respect, with specific testing provisions, e.g. ADR and RID in 6.1.6.

General view of the Netherlands

3. The expert from the Netherlands is of the opinion that compatibility is an important safety issue and should be regulated on a multimodal level for UN-approved packagings.

4. The expert from the Netherlands notes that:

- (a) The issue of the chemical compatibility of packagings in the Model Regulations is covered by a general provision only, and therefore remains under the sole responsibility of the consignor; this philosophy is followed by the International Maritime Organization (IMO);

- (b) This current situation leads to different interpretations of this general requirement depending on the mode of transport;
- (c) The European inland transport regulations (RID/ADR) have incorporated in their provisions specific requirements for the compatibility of several types of plastics materials (see RID/ADR 6.1.5.2.5, 6.1.5.2.6 and 6.1.6). In the RID/ADR 2005 amendments, new requirements for the verification of the chemical compatibility of plastics packagings and IBCs are introduced (see RID/ADR 4.1.1.19, 6.1.5.2.5, 6.1.5.2.6 and 6.1.6);
- (d) Standard EN ISO 16101:2004 has been adopted which covers these new provisions of RID/ADR 2005, and it is to be expected that RID/ADR will make a reference to this standard in the future; and
- (e) The International Civil Aviation Organization (ICAO) Dangerous Goods Panel (DGP) indicated at its 19th meeting that more specified provisions are needed, but felt that this is not a specific airmode issue but a multimodal issue and should therefore be raised at this Sub-Committee level;

5. To avoid lengthy detailed provisions in the Model Regulations, a possible way forward would be to introduce more specific requirements by reference to a relevant standard.

6. Furthermore, for a reference to a standard, two options are feasible, namely a mandatory reference or a reference with a guidance purpose. In the view of the Netherlands these options have the following Pro's and Con's:

	Pro	Con
Mandatory reference	+ compliance + enforcement + unambigues use	- responsibility of the authorities - less flexibility
Guidance	+ responsibility of the consignor + more flexible + less administrative burden for the industry	- multi interpretable - non-unambigues use - maybe less safe

Action requested of the Sub-Committee:

7. The Sub-Committee is invited to take note of the information given by the expert from the Netherlands and to discuss the possible need for more specific requirements for compatibility verification/testing in the Model Regulations.
