ECONOMIC COMMISSION FOR EUROPE

INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

Joint Meeting of the RID Safety Committee and the Working Party on the Transport of Dangerous Goods (Geneva, 13-17 September 2004, agenda item 5)

NEW PROPOSALS TO AMENDMENTS TO RID/ADR/ADN

Compatibility testing of plastics packaging

Transmitted by EuPC European Plastic Converters

Comment to Proposal TRANS/WP./AC.1/2004/19 from the Netherlands

EuPC supports basically the proposal from the Netherlands to take over the results of the CHEMPACK project into RID/ADR. However, with respect to existing design type approvals EuPC fears that the modification proposed in Chapter 6.1.6.1. (a), second clause, will lead to the consequence that the further validity of those design type approvals which were not tested with alkyl benzene sulphonate could be threatened. In order to prevent such consequence which was not intended by the applicant, EuPC proposes a text which recommends alkyl benzene sulphonate as wetting agent but not exclusively.

Proposal:

6.1.6.1. (a) second clause to read,

"An aqueous solution of 1 to 10% of a wetting agent (for example, alkyl benzene sulphonate) shall be used. The surface tension of this solution shall be 31 to 35 mN/m at 23° C".