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INLAND TRANSPORT COMMITTEE

Working Party on the Transport of Dangerous Goods

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19-23 January 2004,
Agenda item 5 (a)

PROPOSALS FOR AMENDMENTS TO ANNEXES A AND B OF ADR

Revision of the proof of the chemical compatibility with liquids for plastics drums and jerricans, composite packagings (plastics material), rigid plastics IBCs and composite IBCs

Comment by the secretariat on the decision of the Joint Meeting and the proposal by the Government of Germany (TRANS/WP.15/2004/16)

General

1. Reference is made to the discussions of the RID/ADR/ADN Joint Meeting concerning the list of entries to which standard liquids have been assigned for the purpose of testing chemical compatibility with plastics packagings.

2. In accordance with the decisions of the Joint Meeting (TRANS/WP.15/AC.1/94, para. 91), the Government of Germany has prepared a new list, in consultation with the secretariat, to take account of the comments made by the secretariat during the Joint Meeting. Due to lack of time for solving all issues before the deadline for submitting documents, the Government of Germany and the secretariat have agreed that the secretariat would submit unresolved issues to the RID Safety Committee and the Working Party on the Transport of Dangerous Goods in a separate document.

General comments

3. The secretariat notes that, although the list could be reduced substancially, by eliminating all those isomers already covered by existing entries, it is still 20 pages thick and it is far from covering all substances presently assigned to standard liquids in the existing 6.1.6.2. of RID/ADR. For example,a wide range of hydrocarbons, aldehydes or ketones (such as UN 1193, ethyl methyl ketone), presently assimilated to the standard liquid "mixture of hydrocarbons" are not included in the list. Therefore, in the future, once all substances likely to be carried in plastics packagings have been tested, the list may be expected to grow up to a size similar to that of Table A of Chapter 3.2, and even more since it includes also a wide range of individual substances not listed by name in table A of Chapter 3.2 but assigned, in the new list, to collective entries.

4. Another example is the fact that 23 individual substances, not presently listed by name in RID/ADR, have already been included under UN 3082. The question should be asked whether the multitude of other substances to be classified under UN 3082 will also be included in future.

5. In this respect, it should be noted also that until now, individual substances meeting the criteria of RID/ADR and to be classified under collective entries have never been listed individually. Including them in such a list in RID/ADR would imply a certain recognition of their classification, when no data have been submitted to the Joint Meeting for their classification. The secretariat believes that this is dangerous. For example, in the original submission TRANS/WP.15/AC.1/2003/20, piperazine aqueous solutions, packing group III, had been listed under UN No. 2735, when they are in fact covered by UN2579. Similarly, diphenylmethane-4,4'-diisocyanate was listed under UN 3080 although this substance previously assigned to UN 2489 had been removed from class 6.1 in 1994.

6. The secretariat wishes also to draw attention to the fact that the implementation of this new system is likely to cause immediate practical effects for the use of packagings presently authorized for a wide range of industrial products. For example, packagings tested with hydrocarbon mixtures as a standard liquid may now be used for many petroleum products, hydrocarbons, halogenated substances, esters, aldehydes, ketones, etc. As from 1st July 2005, these packagings will be authorized only for those substances included in the list, which is far from covering this wide range of products. Therefore it seems that tests will have to be performed for all non-listed substances which are presently authorized in plastics packagings. Although the practical consequences for the industry are not entirely clear to the secretariat, it seems that no transitional period, apart from the usual six month transitional period, has been provided for by the Joint Meeting.

7. Finally it should also be borne in mind that, in future, amendments to table A of Chapter 3.2 are likely to require a systematic checking of this list for consequential changes, including eventually the proper allocation of individual entries under collective entries.

8. The RID Safety Committee and the Working Party on the Transport of Dangerous Goods might wish to take the above comments into consideration.

Comments on the list

9. The secretariat considers that the assimilation list could be further reduced. In some cases, (e.g. UN 3145 alkylphenols, liquid, n.o.s.) a standard liquid is assigned to the collective entry (for UN 3145 "n-Butylacetate/n-butylacetate-saturated wetting solution") instead of "Rule for collective entries". In such a case, it has to be assumed that all substances covered by the collective entry, except those listed by name with a different standard liquid, can be assimilated by default to the standard liquid of the collective entry. Therefore there is no need to list an individual substance with the same standard liquid as the collective entry. For example, under UN 3145, it makes sense to list butylphenols because the standard liquid (acetic acid) is different from the one for the collective entry ("n-butyl acetate/n-butyl acetate saturated wetting solution). However, there is no need to list dodecylphenol and nonylphenol.

10. Therefore the secretariat proposes the deletion of the following entries:

2584 Dodecylbenzene sulphonic acid
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2733 All individual entries (they all have the same liquid standard as the collective entry)
2734 All individual entries except "Di-sec-butylamine"
2735 All individual entries
3145 Dodecylphenol
Nonylphenol.
