



Secretariat

**Distr.
GENERAL**

**ST/SG/AC.10/1998/16
17 September 1998**

Original: ENGLISH

**COMMITTEE OF EXPERTS ON THE
TRANSPORT OF DANGEROUS GOODS**

**(Twentieth session,
Geneva, 7-16 December 1998,
agenda item 2 (b))**

**WORK OF THE SUB-COMMITTEE OF EXPERTS ON
THE TRANSPORT OF DANGEROUS GOODS**

Packing instructions

**Report of the informal Working Group on Packing Instructions
(Frankfurt, 7 - 11 September 1998)**

Submitted by the experts from Germany and the United Kingdom

Introduction:

1. An informal Working Group on Packing Instructions met at DEGUSSA AG in Frankfurt (Germany) from 7 to 11 September, 1998. The following countries were represented: Bahamas, Belgium, Canada, France, Germany, Netherlands, Norway, United States of America, United Kingdom. Representatives from the following organisations took part: European Chemical Industry Council (CEFIC), Hazardous Materials Advisory Council (HMAC), International Confederation of Plastics Packaging Manufacturers (ICPP), International Council of Intermediate Bulk Container Association (ICIBCA) and the Central Office for International Railway Transport (OCTI).
2. The meeting was chaired by Mr. J. M. Hart (United Kingdom).

Further consideration of Packing Instructions P 001, P 002, P 003 and P 200:

3. The Chairman introduced a paper containing amended proposals for packing instructions taking account of amendments to document ST/SG/AC.10/C.3/1998/19 agreed during the 14th and 15th sessions of the Sub-Committee. The Working Group stressed that the packing instructions were being developed for the purposes of multimodal transport and that modal deviations should be limited to the minimum deemed necessary for safety reasons; however the group agreed that some modal variations might be necessary, and it agreed to invite the Committee to decide whether acceptable modal variations to the multimodal packing instructions should be consistently indicated.
4. The use of removable head drums for liquids of Packing Group (PG) I should be restricted to liquids of high viscosity in accordance with the decisions made at the Sub-Committee. Some experts still had reservations on the appropriate level of viscosity. The Working Group placed the reference to a viscosity of more than 200 mm²/s in P 001 between square brackets since the Expert from Germany intended to submit further proposals to the Committee.
5. For P 002, Special Packing Provision (SPP) 7, it should be checked whether transport as a “full load” or as a “single commodity” is a suitable requirement for UN 2000 celluloid in sheets.
6. The Working Group deleted SPP 10. The International Maritime Organization (IMO) should be invited to consider its decision in view of that deletion.
7. P 200 was also applied to some special substances of other divisions. For gas cylinders, the text was based on the existing provisions but the Working Group recognized, as proposed by the representative of CEFIC, that more work on definitions and requirements (including design type testing and approval, initial and periodical testing) for cylinders and other receptacles or pressure vessels for gases taking into account work of standardisation bodies and others will be needed. The Working Group invited the Committee to take this into account for the work programme for the next biennium. For the adopted P 200 the Working Group agreed that the requirements approved by the competent authority are the existing provisions of the modal, regional and national regulations. Until the inclusion of specific requirements in the Model Regulations, P 200 should be regarded as a reminder.

Review of the remaining Packing Instructions for Packagings:

8. Most packing instructions were agreed with minor editorial changes.
9. For P 301, the Working Group agreed on the existing text of the ICAO Technical Instructions, but ICAO should be invited to check this packing instruction for relevance and correct technical description.

10. P 303 was deleted. It is reflecting a restriction for UN 1131 only and the sea mode only. IMO should be invited to check whether this packing instructions is still necessary or could be replaced by P 001 with a SPP requiring “hermetically sealed inner packagings and single packagings”
11. P 400 was kept but the Working Group recognized that for cylinders, receptacles and pressure drums more work will be needed in the next biennium. Some pressure drums with a test pressure of 1.0 MPa (10 bar) have been accepted by competent authorities for pyrophoric liquids, they have been approved with a 1A1 code. Some types of suitable outer packagings have been added to paragraphs (2) and (3) of P 400.
12. P 401 was amended although the Working Group considered that further work would be needed in the next biennium.
13. P 403 was agreed for solids of division 4.3, but a new P 403a was added for pyrophoric solids.
14. In P 405, UN 1348 was added to SPP 24 and UN 1517 to SPP 26. Consequential amendments to the Special Provisions column in the list of UN entries were made. To specify the maximum quantity limits of the packagings, a reference to the test procedure of chapter 2.1.3.5 was inserted against paragraphs (1) to (3). In the IMDG Code, such limits deducted from the test results according to that procedure are currently indicated.
15. For P 408 it was agreed to include additional packagings on the basis of proposals from the Expert from France in order to include both packing methods of the current special provisions 132 and 215. Consequentially Special Provision 133 should be deleted.
16. In P 409 , 4H1 packagings were deleted, because, according to 6.1.4.12.2, 4H1 packagings are designed for inner packagings only and therefore cannot be used as a single packaging; P 002 was amended accordingly. Different views were expressed whether bags should be allowed for division 4.2 and 4.3 solids of PG II. The IMDG Code currently does not allow bags, while ADR/RID allow only 5H4 bags as a full load or palletised. It was agreed to insert 5H4 bags in P 409 for PG II substances to be allowed for transport in closed transport units. Other types of bags were placed between square brackets for decision by the Committee taking into account the need for protection of the contents of the bags against air and humidity from outside. UN 3313 was regarded as a special case, where P 002 is deemed to be appropriate.
17. P 410 outer packagings were restricted to 4G, 30 kg, as in the IMDG Code. Other packagings may be used with the approval of the competent authority, provided tests have demonstrated the absence of any explosive hazards.
18. Packagings 1H1, 3H1, 3A1, 3B1 and composite packagings with plastics inner receptacles were added to P501 as single packagings. In addition, a requirement for venting devices in accordance with chapter 4.1.1.8 was inserted.

19. P 502 was restricted to packing group I liquids of division 5.1. P 504 should cover Packing Group II and III liquids of division 5.1. SPP 28 must be added to UN 2014 in P 504 and UN 2984 in P 001 in order to indicate the minimum ullage, and a reference to chapter 4.1.1.8 for venting devices. Differing views were expressed as to whether this should be a fixed requirement for UN 2014, UN 2015, UN 2984, division 5.1 and hypochlorites of division 8, or whether a general reference to chapter 4.1.1.8 would be sufficient. The Committee is invited to come to a conclusion on this issue.

20. For P 600, the Experts and Industry representatives are invited to consider whether the limit of 75 kg reflects practical needs, as ADR/RID does not currently include this restriction.

21. P 601 was deleted, as the existing special provision, with a reference to ICAO Packing Instruction 623, was deemed to be sufficient.

22. P 620 should include the complete text of the current requirements of chapter 6.3 of the Model Regulations. P 621 for UN 3291 should be added, using the current wording of division 6.2, but for the IBC permitted, a separate IBC Packing Instruction (IBC 6X) should be developed.

23. In P 800, the provisions for cylinders, welded steel bottles and flasks were clarified, and limited to a content of a 2,5 l maximum.

24. P 801 was redrafted to include provisions from ADR/RID and the IMDG Code for safe packing and the transport of new and used batteries. The requirements were clarified, but the Working Group was of the opinion that - especially for the transport of used batteries - the subject will need further consideration in the next biennium, the proposed P 801 being deemed to be insufficient, but owing to the lack of time, a perfect solution would not be possible in this biennium.

25. P 802 led to discussions on certain substances, so it was redrafted, and SPP 29 was deleted.

26. In the context of the discussions on P 900, the general question was raised as to whether the UN packing instructions should include provisions which are relevant for one or two modes only. For example, UN 2216 for example is not regulated as a dangerous substance in regulations for land transport in Europe and the United States of America.

27. P 901, P 902 and P 903 were revised in the light of comments from several experts, and redrafted.

28. P 904 was amended to say that packagings according to P 001 for liquids or P 002 for solids, conforming to the PG II performance level, may also be used. It was recognised that Diagnostic Specimen warranted further consideration, with a view to establishing a separate UN entry for it, following which an appropriate packing instruction could be drafted.

29. In P 905, letter c) was amended to take into account special provision 171, which should be amended to include lithium batteries.

Review of the Assignment of Substances to Packing Instructions for Packagings:

30. Discussions were based on a comparison of the agreements reached under item 4. The Working Group checked the assignment of the packing instructions to the UN entries and revised several entries at the request of several experts.

31. Where a solid is transported in a solution and where P 002 is assigned to the solid, P 001 should be used for the solution. Such a general requirement should be included in the new chapter 4.1.3.

32. Where a UN entry covers solids and liquids, both physical states are mentioned and P 001/P 002 were listed in column 8.

33. In both cases, amendments to the column for limited quantities will need to be considered by the Committee in the future, reflecting the two physical states of solid and liquid respectively.

34. For UN 2444, P 001 was adopted. IMO should be invited to check the current provisions of the IMDG Code.

35. For UN 2471, SPP XA was added to indicate that inner packagings of paper and fibre should not be used.

36. For UN 2907, P 409 was adopted; the ADR/RID Joint Meeting should check any consequences for the existing provisions.

37. For UN 2983, P 200 was adopted on the basis of the current provisions of the IMDG Code. Such a restriction does not at present exist in ADR/RID; the industry should check whether other packagings than those listed in P 200 are currently used for this UN entry, and whether they meet the necessary safety requirements.

38. Where Special Provision 76 is currently assigned to a UN entry, it was agreed to assign P 099 to these entries, except for UN 2006 P 002 and for UN 2421 and UN 2455 P 200. Transport under most of these n.o.s. entries is not currently permitted under the IMDG Code and ADR/RID. It was agreed that special provision 76 should not apply to UN 2006.

39. For class 4.1 PG II solids - except wetted explosives and self reactive substances - it was agreed that for dry substances, P 002 would be appropriate and that for wetted solids or solids containing liquids, bags should not be allowed - except in some cases 5H4 bags. P 409 was therefore assigned in this instance. The same restriction was applied to phosphorus sulphides and to hydrides.

40. For solids of division 4.3, PG III, bags should not normally be allowed - except 5H4 bags - and it was therefore agreed that P 409 was appropriate. For some substances, such as UN 1435, UN 1436, bags may be used; in such cases, P 002 was assigned.

41. For UN 1790 for solutions >85 %, ADR/RID currently requires cylinders, but the UN entry currently does not include this distinction. Because of the high vapour pressure of solutions >85 %, this was deemed necessary. It was agreed that for the time being, UN 1790 should be placed in square brackets, because consequential amendments have to be developed. A new UN entry was mentioned, as well as a new special provision. The Committee is invited to review the matter. Consequently SPP 29 was moved from P 802 (not containing single plastics packagings) to P 001 with UN 1790, PG I.

42. P 802 was assigned to UN 1798, UN 1836, UN 2031 and UN 2699, taking into account the oxidizing properties of these substances. This should be reviewed in future by experts and by the industry.

43. For UN entries for substances or products which are dangerous only for air transport, "N/A". (for "not applicable") was inserted, instead of a packing instruction; ICAO should regulate suitable packing instructions for such special cases.

Review of Packing Instructions for IBCs:

44. The Working Group started work on Document ST/SG/AC.10/C.3/ 1998/21. It was first recognised that the principles agreed at the last Sub-Committee meeting were not yet included, because there has not yet been time to revise the document. The principles were then taken into account in assigning UN entries to IBC Packing Instructions.

45. The majority of the Packing Instructions for IBCs were agreed, with minor amendments.

46. IBC 05 was amended, prohibiting certain types of IBC for substances which may liquefy during transport.

47. In this context, a paper from the expert from Germany concerning restrictions for the use of certain types of packagings as single packagings was discussed.

48. The first proposal to prohibit the use of the packagings 1D, 1G, 4C1, 4C2, 4D, 4F, 4G, 4H1, 5L1, 5L2, 5L3, 5H1, 5H2, 5H3, 5H4, 5M1, 5M2 was taken into account by adding the relevant footnote to these types of packagings and the corresponding types of IBC.

49. There was a controversial discussion on the second proposal to require testing of packagings for liquids. Some experts preferred to maintain the current decisions. Other experts expressed support for the proposal. The representative from OCTI and the expert from Germany proposed that for such substances, P001 should generally be assigned. That would lead to

packagings being tested, approved and marked for liquids. Concerning the differentiation with the melting point of 45°C it was also mentioned that the Sub-Committee had agreed not to use this criterion for assigning packing instructions for packagings, but had not considered the matter in respect of IBCs.

50. Agreement on these points could not be reached. The expert from Germany was invited to submit a substantive proposal to the Committee.

51. In view of this situation, the expert from Germany maintained his reservation against the packing instructions in general as already expressed in the reports of the 14th and 15th sessions of the Sub-Committee.

52. In the context of IBC 07, the requirement to transport some types of IBC in closed transport units was discussed. It was agreed that for the multimodal packing instructions for IBCs, such a requirement is necessary. This would include the requirement for closed road vehicles in ADR. Some experts pointed out that WP. 15 should in such cases consider whether sheeted road vehicles may additionally be permitted for road transport in Europe.

53. IBC 09 was amended in a similar manner as packing instruction P 621. The reference to Large Packagings was deleted.

Review of the Assignment of substances to Packing Instructions for IBCs

54. The work then continued with a review of Annex 3, especially column 4, for the methodology for assigning packing instructions for IBCs to UN entries.

55. The use of IBCs for transport was excluded for UN 1204, UN 1261, UN 2059 and UN 3065.

56. For UN 1222, only IBCs with a maximum volume of 450 l were permitted, taking into account special packing provision 26; a new SPP XX was developed. Special provision 26 should be amended for tanks.

57. For UN 1308 there was discussion on whether to allow transport in IBCs or not. Most of the experts were of the view that IBCs should be permitted. The experts from Belgium and Germany maintained their concerns about safety, explaining that this substance may cause serious damage in case of leakage, accidents and confinement.

58. UN 1164, UN 1234, UN 1265, UN 1278, UN 2246, UN 2460 and UN 2612 are substances of PG II having a vapour pressure of >110 kPa at 50 °C. There was discussion on whether to assign a packing instruction for IBCs with a note to the effect that in the packing instruction, IBC XX indicates that IBCs should not be used. It was mentioned that solutions of these substances may have a vapour pressure of 110 kPa or lower, so IBCs may be used. Some other UN entries of division 3, PG II, may include products with vapour pressures up to that limit.

59. It was agreed to assign IBC 02 to these substances and to add a SPP B9 highlighting that IBCs may only be used for mixtures of these substances having a vapour pressure of 110 kPa maximum.

60. UN 2359 and UN 3286 cover substances with three hazards. It was agreed that IBCs should only be used with competent authority approval. IBC 08 was assigned to these UN entries.

61. It was pointed out that for some UN entries, classification may change due to amendments adopted by the Sub-Committee in the current biennium. If these amendments were approved by the Committee in December, the packing instructions for packagings and IBCs will have to be amended accordingly.

62. For substances of class 3 with subsidiary risk 6.1 or 8, PG III, it was questioned whether IBC 03 or IBC 02 should be assigned; problems with the use of composite IBCs with a flexible inner receptacle were raised. Currently the IMDG Code does not allow them, but ADR/RID does. Most experts preferred to keep IBC 03 and to invite IMO to review the matter. The experts from Belgium and Germany did not share that view and were in favour of IBC 02, with the possibility for land transport of extending this to IBC 03. A consensus could not be reached. The Committee is invited to deal with this matter, taking into account the general question whether or not to include modal deviations in the UN packing instructions for packagings and IBCs.

63. For UN 3183 and UN 3186, the assignment of IBC 02 was questioned. The IMDG Code currently permits only metal IBCs, whilst ADR/RID also permits other types of IBC. Most of the experts preferred IBC 02 to be maintained. The expert from Belgium did not share that view.

64. Discussions on several UN n.o.s. entries for solids of classes 4.1 to 4.3 with subsidiary risks of class 6.1 or 8 lead to the decision to create an additional packing instruction for IBCs (IBC 04a) for solids, comprising all types of IBCs except flexible IBC and composite IBCs with a flexible inner receptacle.

65. For UN 1363, UN 1364, UN 1365, UN 1386, UN 1408 and UN 1841, a new SPP B.8 was created, permitting non design type tested and approved IBCs to be used as well.

66. It was agreed that for substances of division 4.3 with any subsidiary risk, PG I, no IBCs should be allowed.

67. It was mentioned that in division 4.3, there are substances which evolve gases in contact with water, which are toxic or corrosive, but not necessarily flammable. Some experts felt that this should be taken into account and IBCs should not therefore be allowed, as was currently the case in the IMDG Code. Other experts pointed out that this is part of the future work of OECD and the Committee in the context of global harmonisation to develop criteria on this and that currently, ADR/RID permits some types of IBC. Most experts preferred to keep IBC 07 and to invite IMO to check the matter.

68. Concerning UN 1340 and UN 3132, on the basis of ADR/RID there was support for IBC 06; some experts raised concerns with regard to sea transport.
69. For chlorates, perchlorates, hypochlorites, bromates and peroxides of division 5.1, PG II and III, the packing instructions were kept; the Working Group recognised that for sea transport, a more restrictive approach might be appropriate.
70. For Class 6.1, subsidiary risk 3, PG III, and vice versa, the expert from Belgium proposed IBC 02 instead of IBC 03 in order to exclude composite IBCs with flexible inner receptacles. The proposal was not supported.
71. For chlorosilanes of division 8, PG II and III, the expert from Belgium proposed not to permit carriage in IBCs. It was added that ADR/RID currently permit IBCs. The Working Group agreed to maintain the packing provisions for IBCs as drafted. If for clear safety reasons for sea transport that would not be acceptable, IMO should decide on suitable restrictions for the sea mode only.
72. The list of UN entries in the IMDG Code, for which design type tested and approved IBCs are not currently required, was reviewed. For UN 1327, UN 1363, UN 1364, UN 1365, UN 1386, 2211, UN 2217, UN 2793 and UN 3314 it was agreed to permit the use of non tested IBCs and SPP B11 was assigned. For UN 1408, UN 2213, UN 2986 and UN 1841 this was not deemed to be safe enough. IBCs for these UN entries should be subject to the normal testing regime.
73. The expert from Belgium proposed that for all isocyanates of all Packing Groups, IBC 01 should be assigned. The proposal received no support. The expert from Belgium therefore expressed his reservation against the packing instructions for IBCs being assigned to isocyanates.
74. For the assignment of packing instructions for packagings and IBCs to substances proposed to be taken into account under so called toxic by inhalation properties, the expert from the United Kingdom submitted a list of existing current derogations for stricter packing requirements in the Model Regulations.
75. The expert from the United States of America introduced his rationalised approach to assign packing instructions to several very dangerous substances, which he considered to be the most toxic substances.
76. Several experts recalled, that the Sub-Committee had decided that no special requirements for “toxic by inhalation” substances were to be included in the next version of the Model Regulation. It was also pointed out that OECD came to a consensus on the proposal for criteria for acute toxicity last week. An extract from the OECD document adopted was distributed. This proposal for the Global Harmonised System for classification and labelling (GHS) was agreed by all those countries represented in the OECD meeting, including all the countries which were represented in the Working Group. It contained notes explaining that high vapour pressure and high volatility may be referred to, but not for classification purposes.

77. The expert from Germany was of the opinion that stricter requirements, which do not currently exist, should not be introduced at present, only to be amended again when GHS classification criteria were implemented. There had not in any case been sufficient time to discuss the document with toxicologists, so he expressed a general reservation against any additional requirements.

78. The expert from the United States of America disagreed, and emphasized, that in his view, the data submitted demonstrate the need for more stringent packing provisions. He proposed to go through the list of substances on a case by case basis.

79. The expert from the United Kingdom pointed out, that the task of the Working Group was to assign suitable packing instructions for packagings and IBCs.

80. The list was checked. It was agreed that for the substances assigned to PG I, no IBCs should be permitted. P001/ P002 was assigned to eight substances.

81. For UN 2668 and UN 2474, division 6.1, PG II, no subsidiary risk, IBC 008 was proposed as a compromise, taking into account the differing views expressed. The expert from the United States of America expressed a reservation against this decision, which he regarded as not being safe enough. The expert from Germany expressed his reservation against this restriction, which he regarded as unjustified and overly prescriptive. The representative from CEFIC shared that view.

82. The Chairman agreed that this decision was not an ideal solution, but seemed to be the only way forward at this time. He hoped that in future, a more comprehensive approach could be developed.

83. It was agreed, that for substances of PG III, there should be no additional requirements.

84. UN 1569 , division 6.1, PG II, no subsidiary risk, was discussed, because the IMDG Code currently restricts packagings, whereas ADR/RID currently do not. Some experts preferred to develop a special packing instruction for this individual substance. A new instruction P 602 was developed. The expert from Germany and the representative from CEFIC opposed the introduction of this instruction. They saw no specific scientific reason for assigning it to UN 1569, and to treat this substance differently from others of division 6.1, PG II with no subsidiary risk. Nevertheless, the other experts present agreed to assign the new P 602 to UN 1569.

85. A new P 601 was created for UN 1051, UN 1092, UN 1185, UN 1259, UN 1380, UN 1994 and UN 2480 in order to harmonise the differing packing provisions for these substances which are not at present uniform..

86. The proposed paragraph 3, with inner drums or composite packagings, and outer drums, lead to questions on how to apply, test and check such packing provisions. It was agreed that the maximum volume of the inner drums should be limited to 125 l, and the expert from the United States of America was invited to review the matter. The expert from Belgium did not agree with this concept of packagings as he was of the opinion that the current provisions of the Model Regulations do not cover such double or overpacked packagings sufficiently.

87. A separate P 80X was drafted for UN 1744.

88. On that basis, packing instructions were assigned to the remaining substances considered to be “toxic by inhalation”. The other substances of PG II were assigned to P 001. The expert from Germany and the representative from CEFIC expressed their concern about the assignment of P 601 to PG II substances.

89. For substances of PG I, where currently no specific restriction for packagings exists, neither in the IMDG Code nor in ADR/RID, but in CFR 49, most experts agreed to assign P 001. The expert from the United States of America reserved his position, preferring instead to assign P 602.

90. For substances of PG I, where currently no special packing provisions exist in ADR/RID, but do in the IMDG Code and CFR 49, most of the experts agreed to assign P 602. The expert from Germany reserved his position, preferring instead to assign P 001.

91. P 200 was assigned to UN 1614, 1745 and 1746.

92. In this context, various views on modal derogations were expressed. Some experts shared the view that the more stringent packing instructions should be used for the Model Regulations, but that less stringent packing instructions could be applied to the modes, especially ADR/RID. Other experts were in favour of using the usual packing instructions as widely as possible for these substances in order to facilitate trade and transport, and to have derogations for the sea mode in the IMDG Code, if convincing safety reasons for that mode made that necessary. No consensus was reached.

Review of the general provisions for proposed packing instructions:

93. The Working Group agreed on some general packing instructions and special packing provisions for chapter 4.1.3.

Provisions for large packagings:

94. The expert from Germany tabled a paper concerning this issue (see annex 5 of this report). He pointed out that some general decisions should be made before large packagings could be included in the packing instructions.

95. The Working Group emphasized, that large packagings should be included in the work on packing instructions and should be completed in this biennium. An interim solution should therefore be agreed which may be extended in the next biennium. The proposals in annex 5 were briefly discussed, with the following results:

- proposal 1: to be proposed by Germany to the Committee;
- proposal 2: to be revised;
- proposal 3: problem recognised, but further work needed;
- proposals 4, 6, 7 and 10: agreed;

- proposals 8 and 9: need further work.

96. It was agreed that experts of the Committee will be informed about the work still to be done and the general principles agreed through the report, in order that they could reach a conclusion in the Committee. A correspondence group will draft the substantive proposals to be submitted in an information paper to the Committee.

Proposed format and location of Packing Instructions in the 11th Revised Edition of the Model Regulations:

97. It was pointed out that the presentation of the packing instructions for packagings, IBCs and large packagings in the columns of the dangerous goods list may cause some editorial problems, and that a practical and user-friendly solution should be found.

98. The Working Group suggested inserting the Packing Instructions as a new chapter 4.1.3 in the Model Regulations so that they appear after the general requirements for packagings and IBCs, but before the specific packing provisions for a single division or group of substances.

Consideration of the Draft Report to the Committee of Experts:

99. The Working Group agreed to attach the following documents to the report for submission to the Committee:

- revised paper on packing instructions for packagings (Annex 1);
- revised paper on packing instructions for IBCs (Annex 2);
- revised paper on the assignment of packing instructions for packagings and IBCs to UN entries (Annex 3);
- proposed amendments to the new chapter 4.1.3 for packing instructions (Annex 4);
- paper tabled by Germany concerning packing instructions for large packagings (Annex 5).

100. Owing to the lack of time, the Working Group could not discuss the following papers:

- N-Type-Packagings (Germany);
- Mixed Packing (Germany);
- Removable head drums for PG I liquids (Germany);
- Compatibility of fluoro compounds (Germany);
- Definition of Combination Packaging (United States of America).

The experts from Germany and the United States of America were invited to submit these documents to the Committee for its next meeting.

Adoption of the draft report:

101. The Working Group adopted the draft report.
