

## 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

9 June 2015

### Forty-seventh session

Geneva, 22 – 26 June 2015

Item 3 of the provisional agenda

**Listing, classification and packing**

## Consideration of the allowance for dangerous goods in excepted quantities in chemical kits and first aid kits, Special Provision 251

Transmitted by the International Air Transport Association (IATA)

### Introduction

1. The change adopted by the Sub-Committee to amend the entry in the dangerous goods list for UN 3316, CHEMICAL KIT and FIRST AID KIT to assign Packing Group II and III against the entry has brought to light a long standing difference between the provisions in the Model Regulations and those in the ICAO Technical Instructions with respect to the substances permitted in these kits.
2. While Special Provision 251 in the Model Regulations restricts substances in chemical kits and first aid kits to those permitted in limited quantities, the equivalent special provision in the Technical Instructions, A44, allows for substances that are permitted as either excepted quantities, and are subject to the inner packaging quantity limits applicable to excepted quantities, or limited quantities.
3. A paper was submitted to the ICAO Dangerous Goods Panel Working Group (DGP-WG/15) meeting in April of this year proposing alignment of ICAO Special Provision A44 to that of Special Provision 251 by removing the allowance for substances permitted as excepted quantities.
4. Although the DGP-WG supported harmonization with the UN Model Regulations, the DGP-WG felt that more consideration was needed before agreeing to the amendment, including determining if the UN Model Regulations should instead align with the Technical Instructions for this particular provision.
3. The purpose of this informal paper is to seek the view of the Subcommittee as to whether there is support for considering a revision to Special Provision 251 to permit chemical kits and first aid kits to also contain substances that may be shipped as excepted quantities. This would allow for some substances in Division 6.1, PG I and Class 3, PG I to be shipped in chemical kits and first aid kits, in addition to those already permitted that meet the allowance for limited quantities.
4. If the view of the Subcommittee is that the existing allowance for substances in kits remain to those permitted as limited quantities this will be taken back to the ICAO DGP for formal consideration at the twenty-fifth meeting of the Panel, DGP/25, in October for

adoption into the 2017 – 2018 edition of the Technical Instructions. If however, the Subcommittee believes that extending substances in chemical kits or first aid kits to include those substances permitted as excepted quantities, then a formal proposal will be brought to the forty-eighth session in November / December.

## **Proposal**

6. The Sub-Committee is invited to provide their advice regarding the consideration around Special Provision 251 vs. ICAO Special Provision A44.
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