



Secretariat

Distr.  
GENERAL

ST/SG/AC.10/C.3/2004/60  
20 April 2004

ORIGINAL: ENGLISH

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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-fifth session, 5-14 July 2004  
Item 6 of the provisional agenda

LISTING, CLASSIFICATION AND PACKING

Amendment to SP251

Transmitted by the International Council of Chemical Associations (ICCA)

**1. Background**

Currently Special Provision SP251 limits the use of UN 3316 to boxes or cases that contain small quantities of various dangerous goods, which are used for medical, analytical or testing purposes. Small kits of chemicals used for other purposes cannot be shipped as UN 3316: this means that each dangerous good of the kit must be described according to Chapter 5.4 and, when transported under the provisions of limited quantities, the words "limited quantity" or "LTD QTY" shall be included.

**2. Introduction**

An example of such a kit of chemicals, which cannot be shipped under UN 3316, is a window screen repair kit. Each dangerous good of such repair kit must be mentioned separately in the transport document including the word "limited quantity". Such a repair kit typically consists of

- 1 x 10 ml coating solution (UN 1139);
- 1 x 15 ml Ethyl acetate (UN 1173);
- 1 x 10 ml Heptanes (UN 1206);
- 2 x 290ml Polyurethane (not hazardous for transportation).

The need for documentation for the transport of such a repair kit is tremendous taking into account that each car model may have a different kit, resulting in several hundreds of kits with different descriptions and proper shipping names: this leads to a huge documentary workload without any proven safety benefit.

In case these repair kits can be shipped under one UN entry (UN 3316) the handling and control of the dangerous goods and the documentation would be easier for all parties involved.

### **3. Proposal**

Amend the first sentence of the first paragraph of SP251 as follows (additions underlined):

“The entry CHEMICAL KIT or FIRST AID KIT is intended to apply to boxes, cases etc. containing small quantities of various dangerous goods which are used for medical, analytical, testing or repair purposes.”

### **4. Justification**

The remainder of SP251 contains already sufficient provisions to avoid abuse:

- Such kits may not contain dangerous goods for which the word "NONE" has been indicated in Column 7 of the Dangerous Goods List;
- Components shall not react dangerously (see 4.1.1.6);
- The total quantity of dangerous goods in any one kit shall not exceed either 1 l or 1 kg;
- The packing group assigned to the kit as a whole, shall be the most stringent packing group assigned to any individual substance in the kit.

As already mentioned earlier, the handling and control of the dangerous goods and the documentation will be easier for all parties involved. It will even lead to a higher level of safety throughout the whole supply chain and will furthermore limit the risks of errors in the documentation.

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