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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**

**Forty-eighth session**

Geneva, 30 November – 9 December 2015

Item 3 of the provisional agenda

**Listing, classification and packing**

Allowance for dangerous goods in excepted quantities in chemical kits and first aid kits, Special Provision 251

Submitted by the International Air Transport Association (IATA)[[1]](#footnote-2)

1. At the forty-seventh session of the Sub-Committee, IATA submitted an informal document INF.11 (47thsession) seeking the views of the Sub-Committee on a difference between the Model Regulations and the ICAO Technical Instructions, where the Technical Instructions permit dangerous goods in excepted quantities, and therefore some substances in Packing Group I are permitted.

2. The comments provided by the Sub-Committee at the forty-seventh session were supportive of allowing dangerous goods that are permitted as dangerous goods in excepted quantities to be included within Special Provision 251, and therefore allowed as UN 3316, CHEMICAL KIT and FIRST AID KIT.

3. The purpose of this paper is to propose the amendments necessary to bring into the scope of Special Provision 251, dangerous goods in excepted quantities and also to propose the revisions to the Dangerous Goods List to reflect the consequential changes.

4. In considering the consequential changes to the Dangerous Goods List there are two alternatives presented. The first is to simply add in an additional row to reflect Packing Group I. The other is to delete reference to the packing groups and to revert to a single row with the packing group column left blank. The basis for this that it is possible to have no packing group assigned, as permitted by SP 251, and for that reason it is seen as preferable to leave the actual determination of the packing group to the consignor.

Proposal

5. Modify Special Provision 251 to read as follows:

251 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 example for medical, analytical or testing or repair purposes. ~~Such kits may not contain dangerous goods for which the quantity “0” has been indicated in column 7a of the Dangerous Goods List of Chapter 3.2.~~Such kits shall not contain dangerous goods for which “E0” is indicated in column 7b of the Dangerous Goods List on Chapter 3.2.

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.

Where the kit contains only dangerous goods to which no packing group is assigned, no packing group need be indicated on the dangerous goods transport document.

Kits which are carried on board vehicles for first-aid or operating purposes are not subject to these Regulations.

Chemical kits and first aid kits containing dangerous goods in inner packagings which do not exceed the quantity limits for limited quantities applicable to individual substances as specified in Column 7a of the Dangerous Goods List of Chapter 3.2 may be transported in accordance with Chapter 3.4.

6. If the proposal above is agreed, it is proposed to make the following consequential change to the entry for UN 3363 in the Dangerous Goods List:

Option 1

| **UN No.** | **Name and description** | **Class or division** | **Subsi-diary risk** | **UN packing group** | **Special provi-sions** | **Limited and excepted quantities** | | **Packagings and IBCs** | | **Portable tanks and bulk containers** | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Packing instructions** | **Special packing provisions** | **Instruc-tions** | **Special provisions** |
| (1) | (2) | (3) | (4) | (5) | (6) | (7a) | (7b) | (8) | (9) | (10) | (11) |
| 3316 | CHEMICAL KIT or FIRST AID KIT | 9 |  | I | 251 340 | See SP 251 in Chapter 3.3 | See SP 340 in Chapter 3.3 | P901 |  |  |  |
| 3316 | CHEMICAL KIT or FIRST AID KIT | 9 |  | II | 251 340 | See SP 251 in Chapter 3.3 | See SP 340 in Chapter 3.3 | P901 |  |  |  |
| 3316 | CHEMICAL KIT or FIRST AID KIT | 9 |  | III | 251 340 | See SP 251 in Chapter 3.3 | See SP 340 in Chapter 3.3 | P901 |  |  |  |

Option 2

| **UN No.** | **Name and description** | **Class or division** | **Subsi-diary risk** | **UN packing group** | **Special provi-sions** | **Limited and excepted quantities** | | **Packagings and IBCs** | | **Portable tanks and bulk containers** | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Packing instructions** | **Special packing provisions** | **Instruc-tions** | **Special provisions** |
| (1) | (2) | (3) | (4) | (5) | (6) | (7a) | (7b) | (8) | (9) | (10) | (11) |
| 3316 | CHEMICAL KIT or FIRST AID KIT | 9 |  | ~~II~~ | 251 340 | See SP 251 in Chapter 3.3 | See SP 340 in Chapter 3.3 | P901 |  |  |  |
| ~~3316~~ | ~~CHEMICAL KIT or FIRST AID KIT~~ | ~~9~~ |  | ~~III~~ | ~~251 340~~ | ~~See SP 251 in Chapter 3.3~~ | ~~See SP 340 in Chapter 3.3~~ | ~~P901~~ |  |  |  |

1. In accordance with the programme of work of the Sub-Committee for 2015-2016 approved by the Committee at its seventh session (refer to ST/SG/AC.10/C.3/92, paragraph 95 and ST/SG/AC.10/42, para. 15). [↑](#footnote-ref-2)