



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
MEETING OF THE WORKING GROUP OF THE WHOLE**

The Hague, 3 to 7 November 2008

Agenda Item 2: Development of recommendations for amendments to the *Technical Instructions for the Safe Transport of Dangerous Goods by Air* (Doc 9284) for incorporation in the 2011/2012 Edition

2.3: Part 3 — Dangerous Goods List, Special Provisions and Limited and Excepted Quantities

2.4 Part 4 — Packing Instructions

Assignment of Packing Group to UN 3316

(Presented by D. Brennan)

SUMMARY

This paper invites the working group to consider the requirements applicable to UN 3316 – **Chemical kit** / **First aid kit** with respect to assignment of a packing group.

Action by the DGP-WG is in paragraph 2.

1. INTRODUCTION

1.1 Recently a question was raised regarding the preparation of the dangerous goods transport document where a packing group was shown for UN 3316, **Chemical kit**. An inspector challenged the operator who had accepted the consignment as to why the consignment was accepted when no packing group is assigned to the entries for UN 3316, **Chemical kit** and **First aid kit** in Table 3-1 of the Technical Instructions.

1.2 The entries for chemical kit and first aid kit in Table 3-1 are consistent with the entry for UN 3316 in the Dangerous Goods List in the UN Model Regulations.

1.3 The UN Model Regulations however has Special Provision 251 assigned to UN 3316, which in part states, “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.”

1.4 Some of the text contained in UN SP 251 is contained in SP A44 in the Technical Instructions, however the text shown above is in PI 915, but is not in PI Y915.

1.5 The placement of text in a packing instruction regarding assignment of a packing group would suggest that the packaging performance standard required for the commodity is intended to be applied based on the packing group so assigned. The absence of the text in PI Y915 would support that position.

1.6 However, the placement of text in UN SP 251 regarding assignment of the packing group suggests that the packing group assigned is intended to be shown on the dangerous goods transport document and consequently also applies to the packaging performance level for the packagings for these kits.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to amend Special Provision A44 as follows:

A44 The entry chemical kit or first aid kit is intended to apply to boxes, cases, etc., containing small quantities of one or more compatible items of dangerous goods which are used, for example, for medical, analytical or testing or repair purposes. The packing group assigned to the kit as a whole must be the most stringent packing group assigned to any individual substance in the kit. The assigned packing group must be shown on the dangerous goods transport document.

The only dangerous goods which are permitted in the kits are substances which may be transported as:

- a) excepted quantities as specified in column 9 of Table 3-1, provided the inner packagings and quantities are as prescribed in 5.1.2 and 5.2.1 a); or
- b) limited quantities under 3;4.1.2.

2.2 The working group is invited to amend Packing Instruction 915 (960) as follows:

...

Kits may contain dangerous goods which require segregation according to Table 7-1. ~~The packing group assigned to the kit as a whole must be the most stringent packing group assigned to any individual substance contained in the kit.~~

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— END —