



WORKING PAPER

**DANGEROUS GOODS PANEL (DGP)
WORKING GROUP MEETING (DGP-WG/15)**

Montreal, 27 April to 1 May 2015

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 2017-2018 Edition

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

SPECIAL PROVISION A44

(Presented by D. Brennan)

SUMMARY

This working paper proposes to revise Special Provision A44 to align to Special Provision 251 in the UN Model Regulations and to remove reference to the allowance for kits to contain substances permitted in excepted quantities.

Action by the DGP-WG: The DGP is invited to consider an amendment to Special Provision A44 that applies to chemical kits and first aid kits as shown in the appendix to this working paper.

1. INTRODUCTION

1.1 The change to UN 3316 — **Chemical kit** and **First aids kit** to assign Packing Groups II and III against UN 3316 in Table 3-1 — Dangerous Goods List has brought to light an inconsistency in what is permitted in such kits between the UN Model Regulations Special Provision 251 and Special Provision A44 in the Technical Instructions.

1.2 Special Provision 251 in the UN Model Regulations clearly only permits chemical kits and first aid kits to contain dangerous goods that are permitted in limited quantities as follows:

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 (limited quantities).

1.3 However, Special Provision A44 in the Technical Instructions allows for both dangerous goods in limited quantities and those in excepted quantities to be in chemical kits and first aid kits as follows:

A44 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. Components must not react dangerously (see 4;1.1.8). 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. Where the kit contains only dangerous goods to which no packing group is assigned, a packing group must not be indicated 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.

1.4 The issue here is that while dangerous goods in limited quantities are restricted to dangerous goods in Packing Group II and III, dangerous goods in excepted quantities may include dangerous goods in Packing Group I.

1.5 The result of this is that Special Provision A44 is less restrictive than Special Provision 251 in the UN Model Regulations, which means that for multi-modal transport, packages prepared for air transport may contain substances in Packing Group I, which are not permitted in surface transport.

1.6 To address this inconsistency it is proposed to revise Special Provision A44 to align to Special Provision 251 in the UN Model Regulations and to remove reference to the allowance for kits to contain substances permitted in excepted quantities.

2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to revise Special Provision A44 as shown in the appendix to this working paper.

APPENDIX

PROPOSED AMENDMENT TO PART 3 OF THE TECHNICAL INSTRUCTIONS

Part 3

DANGEROUS GOODS LIST,
SPECIAL PROVISIONS AND
LIMITED AND EXCEPTED QUANTITIES

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Chapter 3

SPECIAL PROVISIONS

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Table 3-2. Special provisions

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A44 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. Components must not react dangerously (see 4;1.1.8). 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. Where the kit contains only dangerous goods to which no packing group is assigned, a packing group must not be indicated on the dangerous goods transport document.

The only dangerous goods which are permitted in the kits are substances which may be transported as: limited quantities under 3;4.1.2.

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.~~

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