



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

**Atlantic City, United States, 4 to 8 April 2011**

**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 2013-2014 Edition**

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

**SPECIAL PROVISION A44 — CHEMICAL KITS AND FIRST AID KITS**

(Presented by D. Brennan)

**REVISED**

**SUMMARY**

This working paper proposes some clarification of the text in Special Provision A44 with respect to the packing group where substances or articles have no packing group and also the requirement that substances in chemical kits and first aid kits must be compatible.

Action by the DGP-WG is in paragraph 2.

**1. INTRODUCTION**

1.1 At the recent meeting of the IATA Dangerous Goods Board there was discussion regarding some of the provisions and requirements of Special Provision A44.

1.2 Special Provision A44 relates to chemical kits and first aid kits and states that “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 key word here being “compatible”.

1.3 However, when reading Packing Instruction 960 and Packing Instruction Y960 under the additional packing requirements, there is an allowance that “Kits may contain dangerous goods which require segregation according to Table 7-1.”. Generally dangerous goods are segregated when they are incompatible. This use of compatible in A44, but allowance for goods that are generally perceived as being incompatible is causing some confusion.

1.4 A review of special provision 251 in the UN Model Regulations, which is assigned against the entry for chemical kits and first aid kits, and which is largely the same as A44 in the Technical Instructions, identifies that the word “compatible” is not used and instead the opening sentence of special provision 251 reads “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.”

1.5 It is proposed that Special Provision A44 be revised to align with the language in UN special provision 251.

1.6 Also in A44 is the requirement that “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.”. This language comes directly from special provision 251 in the UN Model Regulations.

1.7 It has been identified that there are chemical kits and first aids that only contain dangerous goods to which no packing group is assigned, i.e. aerosols. This creates confusion for shippers and dangerous goods acceptance persons as to what must be shown for the packing group on the dangerous goods transport document and what packaging standard must be applied.

1.8 To address this inconsistency it is proposed that text be added to A44 to identify that where the only dangerous goods in the chemical kit or first aid kit do not have a packing group that this may be left blank on the dangerous goods transport document. For Packing Instruction 960 it is proposed that where the dangerous goods do not have a packing group that Packing Group II packagings must be used.

## 2. ACTION BY THE DGP-WG

2.1 The DGP-WG is invited to revise 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~~ various 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. Where the kit contains dangerous goods to which no packing group is assigned, no packing group need 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.

...

2.2 The DGP-WG is invited to revise Packing Instruction 960 as shown:

<b>Packing Instruction 960</b>						
Passenger and cargo aircraft for UN 3316 only						
<b>General requirements</b>						
Part 4, Chapter 1 requirements must be met, including:						
1) <b>Compatibility requirements</b>						
— Substances must be compatible with their packagings as required by 4;1.1.3.						
2) <b>Closure requirements</b>						
— Closures must meet the requirements of 4;1.1.4.						
<i>UN number and proper shipping name</i>	<i>State</i>	<i>Inner packaging* (see 6;3.2)</i>	<i>Maximum quantity of dangerous goods per kit</i>	<i>Package quantity — passenger</i>	<i>Package quantity — cargo</i>	<b>SINGLE PACKAGINGS</b>
UN 3316 <b>Chemical kit or First aid kit</b>	Liquid	250 mL	1 L	10 kg	10 kg	No
	Solid	250 g	1 kg			
*Containing dangerous goods.						
<b>ADDITIONAL PACKING REQUIREMENTS</b>						
— Kits may contain dangerous goods which require segregation according to Table 7-1.						
— <u>Packagings must meet the performance standards of the most stringent packing group assigned to any individual substance contained in the kit. Where the kit contains dangerous goods to which no packing group is assigned, packagings must meet Packing Group II performance standards.</u>						
— Kits must not be packed with other dangerous goods in the same outer packaging, with the exception of dry ice. If dry ice is used, the requirements in Packing Instruction 954 must be met.						
...						

— END —