

Economic Commission for Europe

Inland Transport Committee

Working Party on the Transport of Dangerous Goods

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Item 5 (b) of the provisional agenda:

**Proposals for amendments to annexes A and B of ADR:
miscellaneous proposals**

UN 3316 – Chemical and first aid kits transport category

Transmitted by the Government of the United Kingdom

Summary

Executive summary: Under the revised entry for ADR 2019 in relation to UN. 3316, it is not possible to assign a transport category to chemical and first aid kits that contain only dangerous goods with no packing group assigned.

Action to be taken: To add a new paragraph at the end of Special Provision (SP) 671.

Introduction

1. Whilst reviewing the revised entry for ADR 2019 in relation to UN. 3316 CHEMICAL KIT OR FIRST AID KIT industry in the United Kingdom have identified an unanticipated deficiency. Previously, the entry was split onto two lines with a packing group II and a packing group III entry, with each allocated an appropriate transport category. Under the revised text, the second entry corresponding to packing group III has been deleted. From the remaining entry, packing group II has been removed, and the transport category is determined by reference to SP 671 (see Annex).

2. SP 671 deals with the assignment of transport category by reference to packing groups and correctly refers back to paragraph 3 of SP 251 (see Annex). Thus, the most stringent packing group found in the component parts of the kit is taken for the whole kit and the transport category follows. SP 251 also states that, where the kit does not contain items assigned to packing groups, then no packing group need to be displayed on the transport document.

Issue

3. Kits that contain only dangerous goods to which no packing group is assigned (i.e. a kit containing one or more aerosols or other articles) are not considered in SP 671, so no applicable transport category can be determined. Since Column (15) of Table A of Chapter 3.2 cannot be blank checked, a transport category is required on the transport document so

that operators can check the information to correctly assess their loads for possible ADR 1.1.3.6 compliance.

4. To overcome this, the United Kingdom proposes an addition to SP 671, allocating the dangerous goods without a packing group assignment to transport category 2. We are proposing this transport category because, from our experience, the most likely item in a kit that is a dangerous good without a packing group assigned is an aerosol (or other article). Generally, packaging requirements for articles are set at packing group II and, by extension, these are normally transport category 2.

Proposal

5. Add the following new paragraph to the end of SP 671:

“Kits containing only dangerous goods to which no packing group is assigned shall be allocated to transport category 2 for completion of transport documents and the exemption related to quantities carried per transport unit (see 1.1.3.6).”.

Annex

ADR 2019 Amendments to SP 671 and SP 251

6. SP 671

“For the purposes of the exemption related to quantities carried per transport unit (see 1.1.3.6), the transport category shall be determined in relation to the packing group (see paragraph 3 of special provision 251):

- Transport category 3 for kits assigned to packing group III;
- Transport category 2 for kits assigned to packing group II;
- Transport category 1 for kits assigned to packing group I.”

7. SP 251, paragraph 3

“For the purposes of completion of the transport document as set out in 5.4.1.1.1, the packing group shown on the document 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.”
