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Economic Commission for Europe**Inland Transport Committee****Working Party on the Transport of Dangerous Goods****Joint Meeting of the RID Committee of Experts and the
Working Party on the Transport of Dangerous Goods**

Bern, 18-22 March 2019

Item 5 (b) of the provisional agenda

**Proposals for amendments to RID/ADR/ADN:
new proposals****Chemical and first aid kits transport category (UN No. 3316)****Transmitted by the Government of the United Kingdom^{*,**}***Summary*

Executive summary: Included in the amendments for the 2019 editions of RID and ADR was a new special provision (SP) 671, attached to UN No. 3316 CHEMICAL KIT or FIRST AID KIT. An unintended consequence of the amendments made is that under the 2019 regulations, it is not possible to assign a transport category to a chemical or first aid kit that contains only dangerous goods to which no packing group is assigned. This obstructs the completion of transport documents, meaning that when the new regulations become mandatory from 1 July 2019, carriers will be prevented from transporting chemical and first aid kits that fall under this criterion. This document proposes an amendment to the text of SP 671 to allow chemical and first aid kits that contain only dangerous goods to which no packing group has been assigned, to be automatically assigned to transport category 2.

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

* In accordance with the programme of work of the Inland Transport Committee for 2018-2019, (ECE/TRANS/WP.15/237, annexe V, (9.2)).

** Circulated by the Intergovernmental Organisation for International Carriage by Rail (OTIF) under the symbol OTIF/RID/RC/2019/20.

Introduction

1. The amendment proposed by this document was initially contained in informal document INF.9 submitted to the 105th session of the Working Party on the Transport of Dangerous Goods (WP.15) in November 2018. It received support from a number of delegations, however WP.15 asked that the document be redirected to the Joint Meeting as the special provision concerned also appears in RID and ADN 2019.

2. Whilst reviewing the revised entry for RID/ADR 2019 in relation to UN No. 3316 CHEMICAL KIT OR FIRST AID KIT, industry in the United Kingdom 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).

3. 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 be displayed on the transport document.

Issue

4. 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 RID/ADR 1.1.3.6 compliance.

5. 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

6. Add the following new paragraph to the end of SP 671 in RID and ADR.

“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/RID 2019 Amendments to SP 671 and SP 251

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.”

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.”
